

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED
8-03-16
04:59 PM

Order Instituting Rulemaking to Develop a
Successor to Existing Net Energy Metering
Tariffs Pursuant to Public Utilities Code Section
2827.1, and to Address Other Issues Related to
Net Energy Metering.

Rulemaking 14-07-002
(Filed July 10, 2014)

**JOINT PROPOSAL BY THE CALIFORNIA HOUSING PARTNERSHIP, CALIFORNIA
ENVIRONMENTAL JUSTICE ALLIANCE, BRIGHTLINE DEFENSE PROJECT, NATURAL RESOURCES
DEFENSE COUNCIL, AND NATIONAL HOUSING LAW PROJECT (NONPROFIT SOLAR
STAKEHOLDERS COALITION) ON IMPLEMENTATION OF ASSEMBLY BILL 693**

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Date: August 3, 2016

Rulemaking 14-07-002

PROPOSAL FOR THE IMPLEMENTATION OF AB 693

*Nonprofit Solar Coalition
Joint Submission*

August 3, 2016

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Pursuant to the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), the California Housing Partnership Corporation (CHPC), California Environmental Justice Alliance (CEJA), Brightline Defense Project (Brightline), the Natural Resources Defense Council (NRDC), and the National Housing Law Project (NHLP) collectively referred herein as the Nonprofit Solar Stakeholders Coalition, hereby submit a Joint Proposal to implement the Multifamily Affordable Housing Solar Roofs Program (Multifamily Solar Roofs Program) enacted by AB 693.

The Nonprofit Solar Stakeholders Coalition comprise of a large and diverse group of nonprofit organizations incorporated in the State of California that advocate on behalf of the interests of low income renter households, low-income and disadvantaged communities, nonprofit multifamily affordable housing organizations and those working to reduce energy consumption and greenhouse gas emissions and to create cleaner and healthier communities in California.

The members of the Nonprofit Solar Stakeholders Coalition have come together in common cause to develop and submit this Joint Proposal for implementing the Multifamily Solar Roofs Program. The households and communities that we advocate for are the direct and the intended beneficiaries of the AB 693 legislation: households vulnerable to rising energy prices, have high household energy cost burdens, have been largely underserved by California's renewable energy and energy efficiency programs, and often reside in geographic areas

disproportionately burdened by high rates of poverty, socio-economic disadvantages, and multiple sources of pollution and other environmental risk factors. Our objective in working together is to assist the Commission in meeting its responsibilities to develop a program design that satisfies the legislative mandates of AB 693, responds to the long-term energy needs of low-income renters and disadvantaged communities, and contributes to the broader purposes served by the implementation of the program including job placement and reducing greenhouse gas emissions.

The Joint Proposal by the Nonprofit Solar Stakeholders Coalition includes a detailed program design that is responsive to each of the questions and subject areas outlined in the Administrative Law Judge's (ALJ) July 8, 2016 ruling (ALJ Ruling) and additional areas that are essential to the implementation of the Multifamily Solar Roofs Program. First and foremost, the Multifamily Solar Roofs Program is fundamentally a transformational program. The Multifamily Solar Roofs Program will potentially reach over one third of the publically supported affordable multifamily rental housing market in California. The program's scope, which provides a platform for integrating energy efficiency, solar PV, and energy storage strategies, will influence the energy future of over 150,000 low-income households, and shape energy use and energy cost across this segment of the housing market for decades to come. The Nonprofit Solar Stakeholders Coalition ask that these facts and consequences related to the significance of the program be at the forefront of the Commission's deliberations.

The Joint Proposal gives considerable attention to matters of allocating generation and economic benefits to low-income tenants, the requirement for geographic diversity and special efforts needed to address the needs of CalEnvironScreen disadvantaged communities (DACs), the integration of energy efficiency goals into the program structure, the eligibility of energy storage and its role in preserving and enhancing energy benefits for this market, and the incentive structure needed to address financial barriers and scale investment in solar energy systems. The Joint Proposal also includes recommendations for a third-party statewide Program Administrator and the administrative processes and documentation requirements to implement the program.

The ALJ Ruling also references the October 21, 2015 ALJ Ruling requesting parties to Phase I of the AB 327 proceeding to comment on AB 693 ability to “count toward” the Commission’s obligation to develop specific alternatives designed for the growth of Distributed Generation in disadvantaged communities. The Nonprofit Solar Stakeholders Coalition reminds the Commission that owners of affordable housing properties eligible under AB 693 did not have a reasonable opportunity to respond to the questions presented in the October 21, 2016 ALJ Ruling at that time. Since AB 693 targets affordable housing properties and the installation of eligible solar systems can only be accomplished under a program responsive to the needs of property owners and tenants residing at these properties, this omission resulted in the exclusion of the views of key stakeholders specifically included under AB 693. Following the issuance of the Second Amended Scoping Memo and Rule on March 4, 2016, CHPC, CEJA, and Brightline jointly sought clarification of the Scoping Memo and filed a Motion requesting public workshops to engage, educate and inform key constituency groups about key issues and questions affecting the implementation AB 693 before developing and submitting proposals for implementation. No action was taken on this Motion.

In response to this gap, members of the Nonprofit Solar Stakeholders have spent considerable time and resources to actively engage our constituencies and obtain feedback on the design of the Multifamily Solar Roofs Program, incentive structure, and requirements. While the public’s interest and our outreach efforts would have benefited from the requested public workshops, we are confident that the Joint Proposal fairly represents the interest and views of our constituencies. The Nonprofit Solar Stakeholders Coalition requests that the Commission give its full attention to the issues and recommendations presented in our proposal so that the interests of the intended beneficiaries of the AB 693 legislation have an appropriate voice in this proceeding.

We thank the Commission for the opportunity to submit proposals and comments on this important and transformative program and for its thoughtful consideration of our Joint Proposal.

I. Introduction

Assembly Bill (AB) 693, enacted on October 8, 2015, established the Multifamily Affordable Housing Solar Roofs Program (AB 693 or Multifamily Solar Roofs Program). The Multifamily Solar Roofs Program is a legislative response to the profound gap in the level of solar installations serving low-income renters and disadvantaged communities.

The legislation seeks to provide low-income renters located in multifamily housing with greater access to clean energy solutions. In enacting the bill, the Legislature found and declared that:

It is the goal of the state to make qualifying solar energy systems more accessible to low-income and disadvantaged communities and, as in the case of the Multifamily Affordable Housing Solar Roofs Program, to install those systems in a manner that represents the geographic diversity of the state.¹

The lack of solar access by low-income households and disadvantaged communities was a core element in the justification for enacting the bill, as evidenced by testimony presented in support of AB 693. On July 13, 2015, the California Environmental Justice Alliance (CEJA), the primary sponsor of the legislation, provided testimony to the Senate Committee on Energy, Utilities, and Communications that “even with the existing renewable energy programs for low-income and disadvantaged communities, there has only been less than 1% penetration into disadvantaged communities.”² Similarly, at the same hearing, a representative of the MASH Coalition stated that “the growth in solar in California’s residential markets facilitated by the CSI Initiative has largely bypassed low-income renters and disadvantaged communities in California [and] an analysis by the Center for American Progress reported that only 4.2% of the solar installations under the California Solar Initiative (CSI) served households with incomes of less than \$40,000 per year.”³

Major Program Goals and Beneficiaries of AB 663

¹ AB 693 Section 1(e).

² Testimony of Strela Cervas, Senate Committee on Energy, Utilities, and Communications. Public hearing on AB 693, July 13, 2015.

³ Testimony of Randall Simmrin, Senate Committee on Energy, Utilities, and Communications. Public hearing on AB 693, July 13, 2015.

AB 693 was enacted to provide a new framework to affirmatively mitigate barriers to solar PV access at affordable rental properties, and to ensure that benefits from renewable energy are available to these underserved markets. The intended beneficiaries of the Multifamily Solar Roofs Program are low-income renters residing in eligible affordable multifamily properties. In providing these benefits, the design of the Multifamily Solar Roofs Program must carry out various programmatic purposes, which are summarized in Table 1 below

TABLE 1 – Major Programmatic Purposes of AB 693

<i>Scope of Program</i>	<ul style="list-style-type: none"> ▪ Install eligible solar energy systems at eligible affordable multifamily properties. ▪ Ensure geographic diversity for solar energy systems installed through the program. ▪ Facilitate energy efficiency improvements in conjunction with solar energy installations. ▪ Provide economic benefits in disadvantaged communities. ▪ Advance policies for renewable energy and reducing emissions.
<i>Allocations from Systems</i>	<ul style="list-style-type: none"> ▪ Allocate electricity collected and distributed from eligible solar energy system to utility customers at qualified affordable multifamily rental housing sites.
<i>Benefits from Systems</i>	<ul style="list-style-type: none"> ▪ Reduce peak energy use. ▪ Adopt utility tariffs that provide, and continue to provide, net economic benefits to low-income tenants.
<i>Incentive Structure</i>	<ul style="list-style-type: none"> ▪ Set incentive levels to make solar energy systems financially feasible and to account for “split incentive” barriers. ▪ Align incentive levels with reasonable estimates of solar costs. ▪ Reduce incentive levels to account for resources and other project contributions that offset project investment costs. ▪ Provide project financing tools where necessary and appropriate to support incentive structures and maximize ratepayer benefits.
<i>Hiring</i>	<ul style="list-style-type: none"> ▪ Provide a local hiring program to place qualified persons from disadvantaged communities in jobs created by the solar program.
<i>Consumer Protection</i>	<ul style="list-style-type: none"> ▪ Protect and preserve energy benefits provided to program participants and ratepayers. ▪ Safeguard affordable housing properties and tenants from financial risks.

Additional Purposes

AB 693 must support other legislative mandates including policies governing solar installations, priorities applicable to the source of funding for AB 693, and statewide energy efficiency goals applicable to utility-funded programs. These additional purposes are summarized in Table 2 below.

TABLE 2 – Related Statutory Purposes

<i>SB1</i>	<p>SB1 established basic requirements applicable to solar PV installations under the California Solar Initiative. Purposes under SB 1 that are applicable to AB 693's program design include:</p> <ul style="list-style-type: none">▪ Facilitate cost-effective investments in peak electricity generation capacity where ratepayers recoup the cost of their investment by avoiding purchases of electricity at peak rates.▪ Provide monetary incentives for solar energy systems that have the primary purpose of collecting and distributing solar energy.▪ Require reasonable and cost-effective energy efficiency improvements in existing buildings as a condition of providing incentives for eligible solar energy systems.▪ Develop financing options that help offset the installation costs of the solar energy systems.
<i>Section 748.5</i>	<p>Program funding for AB 693 is authorized under Section 748.5 of the Public Utilities Code, which specifies that eligible funding uses include clean energy and energy efficiency projects. The purpose of Section 748.5 to fund a broad range of integrated clean energy solutions should be reflected in the program design.</p>
<i>SB 350</i>	<p>AB 693 was enacted in the same legislative session as SB 350. SB 350 sets a goal to double energy efficiency savings. It requires the CPUC to adopt energy efficiency and demand reduction targets and to implement the targets through programs that provide financial incentives, rebates, technical assistance, and support customers to increase energy efficiency. The implementation of AB 693 provides a means to address the purposes of SB 350.</p>
<i>AB 802</i>	<p>AB 802, enacted on October 8, 2015, requires utilities to provide energy usage information to multifamily properties with five or more active residential or nonresidential utility accounts and establishes energy benchmarking requirements for the covered properties. Implementation of the program will begin on January 1, 2017. As such, energy data sharing and benchmarking set by AB 802 should be incorporated into AB 693's program design.</p>

AB 693's Market Objectives and Program Framework are Different than MASH

The goal to install *at least* 300 megawatts (MW) of new solar capacity under Multifamily Solar Roofs Program is orders of magnitude greater than what was proposed or occurred under Multifamily Affordable Solar Housing (MASH). With funding levels up to \$100 million annually, the Multifamily Solar Roofs program could be installed on over 2,000 properties, comprising more than 150,000 low-income renters, and reaching roughly 30% of the affordable multifamily housing market in California.

This scale and scope of the Multifamily Solar Roofs Program will have a significant transformative effect on California's affordable multifamily rental housing market, and have a lasting effect of California's affordable housing inventory for decades to come. As such, significant attention and efforts are needed to ensure that AB 693's program design anticipates the long-term energy issues affecting this market segment. The market transformation that will occur under AB 693 is also an unprecedented opportunity for multifamily properties to play a pivotal role in the Commission's strategies and plans to move California to a smarter grid.

As a result of significant transformation contemplated by AB 693 and the opportunity to facilitate this change in a manner that advances the transition to a smart grid in low-income markets, any premise that AB 693 is merely an extension of the Multifamily Affordable Solar Housing (MASH) program must be rejected. The AB 693's legislative history also argues strongly against this conclusion.

Within the Legislative Councils Digest and the text of AB 693 there is no statement that the Multifamily Solar Roofs Program was intended as an extension of MASH. In fact, there are only three references to MASH within the text of AB 693 and none of those references state or infer that AB 693 was intended to extend MASH or its program structure.⁴

On the contrary, the CPUC analysis of AB 693 stated that:

⁴ Within AB 693, MASH is first referenced in the Legislative Digest in the context of the 10% set-aside for the SASH and MASH programs under the California Solar Initiatives. The second reference is in section 2870(g)(1). MASH is mentioned in the context of utility bill reductions being achieved through tariffs that allow for the allocation of credits, "such as virtual net metering tariffs designed for the Multifamily Affordable Solar Housing program...." The third reference is in section 2870(j)(1) to the requirement that assessments of the AB 693 program sent to the Legislature include a summary of the other solar programs including MASH.

The Multifamily Affordable Housing Renewables Program would have several important differences from the current Multifamily Affordable Solar Housing (MASH) and Single Family Affordable Solar Homes (SASH) incentive programs.⁵

Several of these differences are specifically discussed in the analysis, including the inclusion of other “qualifying renewable energy systems” in addition to solar-electric systems.

Indeed, throughout the legislative process legislators, committee staff, and program stakeholders asked questions about the similarities and differences between what was proposed under AB 693 and the current MASH program. In response, briefing materials were publically disseminated to legislators, committee and legislative staffs, and other stakeholders that identified deficiencies with current solar PV programs and approaches for serving low-income households in multi-tenant buildings, and identified program elements in AB 693 that provided advantages over the MASH program. These materials include an AB 693 FAQ document sent to affordable housing stakeholders on September 7, 2015 immediately before the Senate vote, and on June 30, 2015, which is provided in Appendix A.⁶ These publically disseminated materials as well as statements such as the previously referenced testimony by the MASH Coalition that “current solar programs have not penetrated the affordable housing markets” and have “largely bypassed low-income renters and disadvantaged communities in California” make it clear that new approaches and solutions were being sought through the AB 693 legislative initiative.

Moreover, if it was the intent of the AB 693 sponsors to continue the MASH program or retain the same program structure, the legislature could have and would have extended funding for a MASH 3.0 program as the legislature did when extending funding for the MASH 2.0.⁷ Neither outcome was included in the enacted AB 693 legislation. Therefore, statements

⁵ Curran, Elizabeth and Kochanowsky, Amy, California Public Utilities Commission, Energy Division, “Division Analysis: Multifamily Affordable Housing Renewables Program.”

⁶ Briefing materials shown in Attachment A were sent to Housing California, the California Housing Consortium, the Southern California Association of Nonprofit Housing, the California Coalition for Rural Housing, the Non-Profit Housing Association of Northern California, the San Diego Housing Commission, and the California Housing Partnership Corporation.

⁷ See AB 217 (Bradford, 2013), available at http://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB217.

that AB 693 “was designed around Decision 15-01-027 (AB 217 or MASH 2.0 proceeding”⁸ are at best inconsistent with the public record, and, as a point of departure for considering how to implement the new Multifamily Solar Roofs Program, are misleading⁹ and apparently driven by parochial interests.

In summary, AB 693 must be taken up on its own terms and responsibly weigh the broad impacts this program will have on low-income renters and property owners in developing a program design that is responsive to a new set of purposes and legislative mandates.

⁸ Everyday Energy, Notice of Exparte Communication, July 1, 2016.

⁹ There are several statement in the Notice of Exparte Communication that merit rebuttal. For example, the focus on affordable multifamily housing in AB 693 was to ensure that installed solar energy systems continue to benefit low-income renters over the useful life of the system. Affordable housing typically has very long affordability periods in which rents are restricted up to 55 years. These same restrictions do not exist for other market segments. AB 693 was not intended, as suggested in the Notice, to readdress the conflicts between Everyday Energy and Shorebreak in the MASH proceeding over the eligibility of mobile homes. Additionally, the program proposal disseminated to Senator Hueso and other public officials in February would have required CARE households at multifamily properties to convert or opt into standard utility rate schedules. This approach would have required added enrollment complexities and minimum tenant PV installations and other protections to ensure that the program would not harm CARE households. This structure for delivering tenant benefits was rejected, and is altogether different from AB 693 and MASH. Furthermore, the statement that the MASH program is oversubscribed does not connote that the projects in the reservation queue will be implemented as proposed. We are concerned that the MASH reservations in the queue may be overstated from what may actually be accomplished. Challenges and financial uncertainty associated with utility allowance adjustments, overlooked by MASH, can adversely affect the scaling of solar to serve residents. Lastly, contrary to the suggestion that Everyday Energy and CALSEIA drafted and are responsible for AB 693, environment justice organizations were already working with CALSEIA on the development of a proposal to serve low income households and disadvantaged communities when Everyday Energy joined the discussion, and that CEJA had a lead role in the drafting and development of the legislation that was eventually enacted.

II. Program Funding¹⁰

The Multifamily Solar Roofs Program is funded from Cap and Trade auction revenues.

Section 2870(c) of Part 2 of Division 1 of the Public Utilities Code provides that:

The commission shall annually authorize the allocation of one hundred million dollars (\$100,000,000) or 10 percent of available funds, whichever is less, from the revenues described in subdivision (c) of Section 748.5 for the Multifamily Affordable Housing Solar Roofs Program, beginning with the fiscal year commencing July 1, 2016, and ending with the fiscal year ending June 30, 2020.¹¹

The use, distribution, and management of this funding resource must be undertaken in a manner consistent with the regulations and policies pertaining to greenhouse gas (GHG) allowances under Article 5 of Title 17 of the California Code of Regulations, Sections 95800 to 96023, and the requirements adopted by the Commission under Decision (D.)12-12-033.

Contributions of GHG Allowance Proceeds

The allocations made pursuant to Section 748.5 are from GHG allowances received by electrical distribution utilities pursuant to subdivision (b) of Section 95890 of Title 17 of the California Code of Regulations and may be used for clean energy and energy efficiency projects. These utilities include Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), Liberty Utilities (CalPeco Electric) LLC (Liberty), and PacifiCorp.

We propose that all of the electrical corporations be required to contribute GHG allowance proceeds toward the Multifamily Solar Roofs Program to ensure that low-income renters throughout the state have access to solar energy systems. If the customers of an electric corporation are included in the program design, the utility must be required to contribute GHG proceeds as directed by AB 693. The exclusion of one or more of the electrical corporations from this program could potentially undermine the requirement to provide broad geographic diversity and solar access to qualified affordable multifamily properties. In particular, exceptions to making GHG allowance contributions from PG&E, SCE, and SDG&E

¹⁰ Questions 18,19,20, and 21 of the ALJ's July 8, 2016 Ruling are covered in this section.

¹¹ AB 693 amendments to Public Utility Code (PUC). Part 2 of Division 1 of the PUC, Section 2870(c).

should not even be considered since there are large numbers of eligible multifamily affordable properties and renters within each of these utilities' service jurisdictions.

Contribution Levels

Currently, roughly \$1 billion in annual allowance revenues are distributed to residential customers as the California Climate Credit from the designated electrical corporations. The table below shows an estimate of 2015 auction proceeds prepared by the California Assembly in September of 2015, and percentage contribution from each utility.

Table 3 - Electric IOU Allowance Proceeds Available for Clean Energy and Energy Efficiency Projects, 2015

Utility	Forecast of 2015 Allowance Auction Proceeds^{12,13}	Percent of Auction Proceeds
Pacific Gas and Electric Company	\$438,602,830	39.31%
Southern California Edison	\$562,499,489	50.41%
San Diego Gas & Electric Company	\$98,717,335	8.85%
PacifiCorp	\$11,870,145	1.06%
Liberty Utilities (CalPeco Electric)	\$4,078,910	.037%
Total	\$1,115,768,709	

AB 693 contemplates that all of the participating electrical corporations will contribute a similar percentage share of their GHG allowances to support the Multifamily Solar Roofs program.

In addition to requiring all electric investor-owned utilities (IOU) to contribute towards AB 693, we propose that the contributions from participating electrical corporations be calculated using one of the following two methods, depending on whether the total GHG allowances for the year being calculated exceed \$1 billion:

¹² Source: Assembly Floor Analysis, September 10, 2015. Analysis Prepared by: Sue Kateley
http://www.leginfo.ca.gov/pub/15-16/bill/asm/ab_0651-0700/ab_693_cfa_20150910_231003_asm_floor.html

¹³ Total forecast of allowance auction proceeds for 2015 includes allowance proceeds that will be expected to be received in 2015 inclusive of franchise fees and uncollectibles, and the remaining balance of allowance proceeds received in previous years (inclusive of interest) that has not yet been distributed.

- If the allowances for all electrical corporations total \$1 billion or less, each electrical corporation should contribute 10% of its GHG allowances for that year;
- If the combined total allowances exceed \$1 billion, each electrical corporation's contribution should be based on the electrical corporation's percentage of the total allowances for all participating electrical corporations multiplied by \$100 million.

Pursuant to the ALJ's request, tables 4 and 5 provide quantitative examples of the above-described approaches.

**Table 4 - Electric IOU Contributions
Total Auction Allowances Exceed \$1 Billion**

Utility	GHG Allowances	% of Total Allowances	AB 693 Contribution	% Contributed
PG&E	\$438,602,830	39.31%	\$39,309,476	8.96%
SCE	\$562,499,489	50.41%	\$50,413,628	8.96%
SDG&E	\$98,717,335	8.85%	\$8,847,473	8.96%
PacifiCorp	\$11,870,145	1.06%	\$1,063,854	8.96%
Liberty (CalPeco Electric)	\$4,078,910	.037%	\$365,569	8.96%
	\$1,115,768,70			
Total	9	100%	\$100,000,000	

**Table 5 - Electric IOU Contributions
Total Auction Allowances Equal To or Less Than \$1 Billion**

Utility	GHG Allowances	% Contributed	AB 693 Contribution
PG&E	\$350,882,264	10.00%	\$35,088,226
SCE	\$449,999,591	10.00%	\$44,999,959
SDG&E	\$78,973,868	10.00%	\$7,897,387
PacifiCorp	\$9,496,116	10.00%	\$949,612
Liberty (CalPeco Electric)	\$3,263,128	10.00%	\$326,313
Total	\$892,614,967	10.00%	\$89,261,497

Mechanism for Directing Allocations and Data Confidentially

The regulatory mechanism for the allocation of GHG allowances and proceeds is established under Article 5 of Title 17 of the California Code of Regulations, *California Cap on Greenhouse Gas Emissions and Market-based Compliance Mechanisms to Allow for the Use of*

Compliance Instruments Issued by Linked Jurisdictions. Under these guidelines, the electrical corporation shall calculate the value of these allowances based on the average market clearing price of the four quarterly auctions held in the same calendar year that the allowances are allocated. The monetary value of allowances received by the electrical corporation is deposited directly into compliance accounts.¹⁴

We propose that the electrical corporations be required to retain or reserve 10% of the GHG allowance value in an AB 693 reserve account pending a determination by the Commission on the annual program funding level at the beginning of each funding year. The annual program level should be based on the cumulative value of GHG allowances for each of the participating electrical corporations. Once the Commission sets the annual program level and the calculated contribution for each electrical corporation, the Commission should order the transfer of funds from the electrical corporation's AB 693 reserve account to the AB 693 program account administered by the Program Administrator. The methods for determining the funding levels for the Multifamily Solar Roofs Program and calculating the contributions for each participating electrical corporation should be transparent to assure program stakeholders and members of the public that the correct amount of funds are allocated to the program each year.

This process does not require the disclosure of information concerning internal bidding strategies or bidding information. Rather, what is required is that the Commission provide sufficient regulatory oversight of the reporting and accounting required under Title 17 of the Code of California Regulations and also provide timely disclosures of the cumulative annual GHG allocations and revenues received by each participating electrical corporation to be credited directly to the residential, small business, and emissions-intensive trade-exposed retail customers of the electrical corporation pursuant to subdivision (b) of Section 95890 of Title 17 of the California Code of Regulations.

Funding Availability and Annual Allocations

The amount of funding available on a year-to-year basis for the Multifamily Solar Roofs program will depend on the results of the auctions, which are held at scheduled quarterly

¹⁴ Article 5 of Title 17 of the California Code of Regulations, Sections 95800 to 96023.

intervals throughout a year. To provide a predictable level of annual funding for qualifying projects and account for time differences in the collection of auction allowance proceeds and year to year revenue uncertainties associated with auction-based funding, we propose that the program funding levels be set annually based on the auction proceeds for the previous year.

Pursuant to Section 2870(c), the collection of receipts supporting AB 693 commenced on July 1, 2016. Pursuant Section 2870(f)(1), the Commission is required to authorize the award of monetary incentives for qualifying solar energy systems. Under this framework, a full year of scheduled auctions collections will have been completed by July 1, 2017. The program budget for investments during the first program year, July 1, 2017 to June 30, 2018, would be set based on the GHG allowance revenues collected through June 30, 2017. Subsequent annual funding allocations for program investments would similarly be based on the prior year's allowance revenues. Program funding not obligated or expended during a program year should be either carried over in a reserve fund or added to the annual funding receipts for future years to support more program investments.

Program Funding After 2020

AB 693 further provides that:

The commission shall continue authorizing the allocation of these funds through June 30, 2026, if the commission determines that revenues are available after 2020 and that there is adequate interest and participation in the program.¹⁵

At this point the outlook for continued funding after 2020 is uncertain. In as much as the planning and design of AB 693 must consider the question of whether funding will be available after 2020, the Commission should state in its decision how and when the issue of future program funding will be taken up and, if known, what factions the Commission will consider in deciding whether revenues are available.

¹⁵ AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(c).

Eligible Uses

Funding for Multifamily Solar Roofs Program must support a variety of administrative, technical support, and capital investment activities. Funding under AB 693 should provide the following:

- *Administrative Funding:* 10% of the annual program allocations should be set aside and used for program administration and to provide for enhanced program support necessary to successfully implement the program. In addition to carrying out core administrative requirements, such as developing program guidelines, managing program applications, reservation and payment processes, verifying program eligibility, conducting outreach to housing organizations, and undertaking periodic program evaluations, the implementation of AB 693 will require the Program Administrator to undertake the following supplemental actions as specified in the legislation:
 - i. *Ensure alignment of program costs and accounting of leveraged resources in setting program incentives and making periodic updates to incentive structure required under 2870(f)(4) and (5)*
 - ii. *Ensure compliance geographic diversity requirements under Section 1(e)*
 - iii. *Conduct outreach and provide technical assistance to property owners and tenants in disadvantaged and underserved communities to increase access to solar energy systems*
 - iv. *Engage community based organizations to facilitate tenant education*
 - v. *Develop protocols and make compliance determinations pursuant to tenant PV allocations and tenant economic benefits requirements under 2870(f)(2) and 2870(g)(1)*
 - vi. *Monitor compliance with local hiring requirements under 2870(f)(6)*
 - vii. *Provide technical support for implementing energy efficiency assessments*
 - viii. *Facilitate “one-stop” access to utility energy efficiency program resources to implement requirements under Section 2870(f)(7)*
 - ix. *Develop protocols and verify compliance with system performance and operation and maintenance requirements under Section 2870(f)(3)*
 - x. *Conduct analysis and market demand assessments required under Section 2870(j)(1) and (2)*

The scope of these additional administrative and support activities justify the need for the proposed budget level.

- *Capital Funding* – 90% of the annual program allocations should be expended on eligible program capital costs. Eligible capital expenses should include equipment and labor costs to install:
 - i. *PV systems serving residential units located at eligible multifamily properties inclusive of rooftop, carport, and ground mounted solar energy systems*
 - ii. *PV systems serving the common areas of eligible multifamily properties*

- iii. Energy storage systems integrated with on-site PV systems installed at multifamily properties*
 - iv. Energy efficiency measures for amounts not funded by ratepayer and Cap and Trade utility energy efficiency as discussed in Section X.*
- *Geographic Distributions* – To provide the Program Administrator with flexibility in committing program resources pursuant to the requirements for geographic diversity, and to implement projects in a timely manner, the funding provided to the Multifamily Solar Roofs Program should be available to any affordable multifamily rental property meeting the eligibility requirements and located within any of the service areas of contributing electrical corporations. Criteria for ensuring geographic diversity should be adopted to ensure the fair allocation of resources across utility jurisdictions during the overall duration of the program.

Funds Control and Evaluation

Section 2870(j)(1) and (2) prescribe extensive program reporting requirements that will require the Program Administrator to put in place accounting controls to monitor and analyze program commitments, reservations, obligations, and expenditures. These requirements mandate that the Program Administrator evaluate program outcomes and benefits in relation to the program costs to assess the effectiveness of the program, including utility bill reductions to program participants, ratepayer benefits from the reduction of CARE outlays, environmental benefits, etc.

III. Program Eligibility¹⁶

Program eligibility is limited to affordable multifamily rental properties. A qualified multifamily affordable multifamily rental property must have five or more rental housing units serving low-income households, that is currently, and continues to be, subject to deed restrictions or other public regulations governing household income levels and rent affordability. We proposed that these affordable restrictions be for a period of 10 years following the receipt of funding from the Multifamily Solar Roofs Program.

Under the specific definition prescribed by AB 693, low-income residential housing means a multifamily residential rental complex financed with low-income housing tax credits, tax-exempt mortgage revenue bonds, general obligation bonds, or local, state, or federal loans or grants in which the rents of the low-income occupants do not exceed those prescribed by deed restrictions or regulatory agreements imposed pursuant to the terms of the public financing or financial assistance.¹⁷ Within this definition, low-income means a household with an income at or below 80% of the area's median income (AMI), which is updated annually for each county by the U.S. Department of Housing and Urban Development (HUD).

Under this definition, AB 693 further divides eligible properties into two categories. A qualified multifamily property either must be located in a Disadvantaged Community as defined by CalEnviroScreen, or must serve a substantially lower household income level, in which 80% of the residents have incomes at or below 60% of AMI.

Profile of Eligible Projects

As of January 2016, there were 6,023 properties with 425,168 units in California that potentially satisfied the AB 693 eligibility requirements. This inventory will gradually increase as new affordable housing properties are constructed under the Low Income Housing Tax Credit (LIHTC) program.

¹⁶ Questions 1,2,3, and 4 of the ALJ's July 8, 2016 Ruling are covered in this section.

¹⁷ AB 693. Section 2870(a)(3). This section references of Section 2852(3)(a)(i) of the Public Utilities Code. See at <http://codes.findlaw.com/ca/public-utilities-code/puc-sect-2852.html>

Disadvantaged Communities (DACs) – Section 2870(3)(B) requires that DACs must be identified by the California Environmental Protection Agency pursuant to Section 39711 of the Health and Safety Code.

Consistent with this mandate we propose that DAC designations for the AB 693 program be determined through the use of the CalEnviroScreen tool.¹⁸ CalEnviroScreen assesses a comprehensive set of community indicators in calculating scores and provides an objective basis for determining overall community need. We recommend that the CalEnviroScreen tool be used either on a utility jurisdiction by utility jurisdiction basis or on a statewide basis depending on which approach has the broadest eligibility.¹⁹ It appears that by using CalEnviroScreen on a utility jurisdiction basis instead of the current statewide basis may ensure that regional conditions and factors affecting community needs are more precisely weighted and not skewed by statewide average scores and that the number of census tracts by utility jurisdiction might increase. However, before a decision is reached, an analysis should be completed to determine which approach provides the broadest eligibility.

Currently approximately 20% of the affordable multifamily properties in California that meet the eligibility requirements under Section 2852 are located in DACs identified by CalEnviroScreen on a statewide basis. Of properties located within IOU jurisdictions, approximately 30% of the eligible properties are in DACs. Because the inventory of affordable multifamily housing qualified under the Multifamily Solar Roofs Program is almost entirely comprised of properties meeting the requirement that 80% of the residents have incomes at or below 60% of the AMI, the use of CalEnviroScreen will not materially affect the number of qualified multifamily properties under the program. The practical effect of the DAC eligibility criteria is to direct targeted efforts in areas that have special needs. Table 6 provides a summary of the number of eligible properties and units within IOU jurisdictions and DACs by type of housing.

¹⁸ The CalEnviroScreen 2.0 may be found at: <http://oehha.ca.gov/ej/ces2.html>.

¹⁹ The Commission recently approved this approach of using CalEnviroScreen in SCE's and SDG&E's electric vehicle pilot programs in A.14-10-014 and A.14-04-014. See D.16-01-045, p.138, and D.16-01-023, p.41.

**Table 6 – Affordable Multifamily Housing
Compliant with Section 2852²⁰**

	State		IOU Jurisdictions		DACs within IOUs ²¹	
	<i>Properties</i>	<i>Units</i>	<i>Properties</i>	<i>Units</i>	<i>Properties</i>	<i>Units</i>
LIHTC	4,213	312,237	2,932	225,173	921	75,187
HUD	1,422	98,812	918	63,549	249	19,276
USDA	388	19,119	315	15,214	91	4,851
TOTAL	6,023	425,168	4,165	303,936	1,261	99,314

CEJA and Kevala developed a GIS-based tool identifying eligible multifamily affordable housing properties. This tool is available at: <https://keva.la/ceja>.

Community Choice Aggregators (CCAs) – Section 2870(i) states that “[t]he commission shall determine the eligibility of qualified multifamily affordable housing property tenants that are customers of community choice aggregators.”

We propose that qualified multifamily properties that are CCA customers should be included in the Multifamily Solar Roofs program. By targeting underserved affordable housing markets and low-income renters, Multifamily Solar Roofs program will address programmatic gaps and compliment other energy programs available in these areas. We further note that the funding source for AB 693²² was established to provide customers of electrical corporations, including customers in CCAs, with a Climate Credit. We see no justification to exclude low-income residents of CCAs from this program.

Eligibility Determinations

There are several factors that significantly simplify the process for determining eligibility of affordable multifamily rental properties under AB 693. Financial assistance provided to multifamily housing from the public entities listed below directly support the development and

²⁰ Prepared by the California Housing Partnership Corporation, January 2016. Analysis is based on housing data compiled by CHPC from public agencies with regulatory oversight responsibilities. Data does not include federally-supported public housing properties administered by public housing authorities. These properties would add approximately 350 properties and 37,650 units to the statewide total.

²¹ Numbers based on Top 25% of DACs as determined on a statewide basis using CalEnviroScreen.

²² Subdivision (b) of Section 95890 of Title 17 of the California Code of Regulations.

operation of low-income, very low-income, and extremely low-income rental housing. This assistance is conditioned on state and federally-monitored compliance with annually updated and officially published housing rent and income restrictions.

- California Tax Credit Allocation Committee (TCAC)
- California Debt Limit Allocation Committee (CDLAC)
- California Department of Housing and Community Development (HCD)
- The California Housing Finance Agency (CalHFA)
- U.S. Department of Housing and Urban Development (HUD)
- U.S. Department of Agriculture – Rural Development (USDA-RD)
- Redevelopment Agency successor agencies in good standing with HCD
- City or county governments, administering HOME Funds in compliance with HUD regulations.

Multifamily rental housing assistance programs administered by the public agencies listed above satisfy both AB 693's requirement that the property have a deed restriction or regulatory agreement prescribing tenant income and rent levels pursuant the terms of financing or financial assistance²³, and AB 693's requirement applicable to properties located outside of DACs that 80% of renter households have incomes at or below 60% of the area median income.

Several public agencies and non-profit organizations maintain databases of affordable multifamily properties within the State of California that can be made available to the Program Administrator to develop a list of properties eligible for the program. This data could assist the Program Administrator in verifying eligibility and streamlining the eligibility process. A list of qualified LIHTC and HUD-assisted multifamily properties, prepared by the California Housing Partnership Corporation (CHPC) from data provided by the public agencies, is provided in Appendix B and C.

Additionally, affordable multifamily rental properties eligible under AB 693 are subject to strict income reporting and verification requirements. Federal and state housing agencies require property owners to collect and maintain records of tenant household incomes. Where a question exists about whether a multifamily rental property meets a particular income standard, the Program Administrator could use a copy of the current rent roll to verify

²³ AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(a)(3). This section references Section 2852(a)(3)(a)(i) of the Public Utilities Code. See at <http://codes.findlaw.com/ca/public-utilities-code/puc-sect-2852.html>

compliance with the program's eligibility standard without disclosing protected tenant information.

Eligibility Requirements and Documentation

To make eligibility determinations, we recommend that the follow requirements be adopted for the Multifamily Solar Roofs Program:

- *Presumption of Eligibility* – Affordable multifamily properties with a deed restriction or regulatory agreement from one of the agencies listed above should be presumed eligible for the Multifamily Solar Roofs program. We recommend that the Program Administrator develop and annually update a list of prequalified affordable multifamily rental housing properties in consultation state agencies and non-profit housing organizations that maintain data on California's affordable multifamily housing inventory.
- *Requirements for Property Certification of Eligibility* – Affordable multifamily properties on the pre-qualified list should be permitted to submit a certification of eligibility to establish program eligibility signed by the property owner or officer of the affordable housing organization. The certification should minimally provide the following information:
 - i. Name and address of the affordable multifamily property.
 - ii. Name and contact information for the public agency that is responsible for regulating the property.
 - iii. Certification that the property has a deed restriction, regulatory agreement or housing assistance agreement with the listed public agency.
 - iv. Certification that the remaining period of affordability on the property is at least 10 years or in instances where the property has less than 10 years remaining on the regulatory agreement, the property owner agrees that the property will extend current rent affordability restrictions at the property for at least 10 years as a condition of receiving incentives under this program.²⁴
 - v. Certification that tenant incomes at the property meet one of the following income eligibility standards:
 - a. Property is located in a DAC and the tenant incomes are at or below 80% of the AMI;
 - b. Property is not in a DAC and 80% of the tenants have incomes at or below 60% of the AMI.
- *Properties Funded by Designated Agencies Not on a Pre-Qualification List* – Newly developed properties and other affordable housing properties that have a deed restriction or regulatory agreement from one of the designated public agencies that are not on the

²⁴ Similar affordability restrictions are set for the California Low Income Weatherization Program for Large Multifamily Projects. The requirements for this program could be used as a model. See: <https://camultifamilyenergyefficiency.org>.

prequalified list of properties should be permitted to make a request to be added to the prequalified list if they can provide additional supporting documentation. The documentation includes:

- i. Copy of each deed restriction, regulatory agreement or housing assistance contract with the listed public agency or agencies.
 - ii. Requirements for Property Certification of Eligibility (listed above).
- *Properties Not Funded By Designated Public Agencies* – Affordable housing properties that have a deed restriction or regulatory agreement from a public entity other than the designated agencies should be permitted to make a request to be added to the list if they can provide supporting documentation including:
 - i. Letter from the public entity or nonprofit organization with regulatory oversight responsibilities that includes information on the rent restriction and other affordability terms and conditions on the property pursuant to the terms of the financing or financial assistance.
 - ii. Copy of each deed restriction, regulatory agreement or housing assistance contract with the listed public agency or agencies.
 - iii. Requirements for Property Certification of Eligibility (listed above).

IV. Geographic Program Targeting²⁵

The Multifamily Solar Roofs program was intended to be broadly available to all qualified affordable multifamily rental properties. The specific legislative direction in AB 693 requires that resources be allocated “to install those systems in a manner that represents the geographic diversity of the state.”²⁶ This requirement precludes a first-come first-serve approach, and calls instead for allocations to be made using a broad set of geographically-based considerations including how resources are distributed between qualified multifamily properties that are located in DACs and qualified properties that are located outside DACs.

While AB 693 does not prescribe a requirement that the Multifamily Solar Roofs Program adopt funding allocations or specific MW capacity targets based on whether a property is located in a DAC or outside of a DAC, we recommend geographic program targets based on funding allocations. An equitable distribution of funding between these DAC and non-DAC properties will further the legislative goal to install qualified systems “in a manner that represents the geographic diversity of the state.”²⁷

Under AB 693, setting geographic program targets based on funding levels is more logical than a MW based target because of the uncertainty around the amount of annual auction proceeds, the need for dollars before installations and MW can be realized, and because the actual *investment spending* in each community is directly correlated with things like job training, job placement, and other economic development opportunities.

DAC Funding Target

Under the approach proposed above, we specifically recommend that funding targets be set based on the percentage of eligible properties that are located in CalEnviroScreen DACs and percent of qualified properties located outside of CalEnviroScreen DACs. In this regard, as shown in Table 6, the number of qualified multifamily properties in DACs is approximately 30% of the total qualified multifamily properties in IOU jurisdictions as defined on a statewide basis using the CalEnviroScreen tool (see table 6). Assuming CalEnviroScreen is used on a statewide

²⁵ Questions 5, and 6 and 23 of the ALJ’s July 8, 2016 Ruling are covered in this section.

²⁶ AB 693. Section 1.(e)

²⁷ AB 693 Section 1(e).

basis for the Multifamily Solar Roofs Program, we proposed that 30% of the program's funding on an annual basis be allocated for use in DACs. If CalEnviroScreen is used by IOU service territory or some combination of service territory or statewide, then the Commission would need to calculate the new percentages of DAC-eligible buildings and adjust the funding allocation accordingly.

Flexibility in Managing Target

To successfully implement the Multifamily Solar Roofs Program, the Program Administrator (PA) should have flexibility during a funding year to move funds from an undersubscribed allocation category to an oversubscribed category to ensure that program implementation is not bottlenecked and solar projects are being installed in a timely and efficient manner. However, before moving funds from DAC allocations for the benefit of properties located outside of DACs, the PA should be required to provide additional outreach and technical support to undersubscribed areas to ensure that properties within these areas have access to the program funding that is available. Additionally, we recommend that the PA be required to file an advice letter before shifting funds to ensure that stakeholders have the opportunity to comment on the proposed transfer.

Any transfer that is authorized should not exceed the total demand for incentive dollars needed by the other bucket, and when applications are received in the undersubscribed bucket, those applications should be prioritized in an attempt to preserve the original allocation as much as possible. To ensure that funding targets are met for DACs, the Program Administrator should be required to make adjustments in future program year allocations to ensure that over the course of the program the funding allocation targets for DACs are met.

Other Geographic Diversity Considerations

In addition to allocating incentive dollars according to DAC and non-DAC designations, The Program Administrator should track reservations and installations to ensure geographic diversity throughout California. AB 693 aims to install qualified systems "in a manner that

represents the geographic diversity of the state.”²⁸ Accordingly the distribution of solar installations and funding commitments is also important in terms of whether the project is in urban, suburban, and rural communities.

While we do not recommend specific funding or MW targets based on these or other geographic designations, we recommend that the Program Administrator make efforts to ensure that low-income multifamily building owners and tenants in all geographic settings benefit from going solar. This approach could be similar to what occurs in the SASH program and the efforts made to ensure that all counties within the state benefit from program investments.

Resource Allocation Plan and Goals

To implement the proposed targets, we recommend that the Program Administrator prepare a Resource Allocation Plan and set an annual funding targets DACs and non-DAC that is based on available funding and assessment of solar market potential and demands, as well general consideration for achieving broader statewide geographic diversity objectives.

We propose that the Resource Allocation Plan should be developed and updated annually in consultation with environmental justice and other community-based organizations to develop priorities and strategies for meeting geographic diversity goals and objectives. The goal of the plan should be to develop general criteria and guidelines for allocating resources and should identify additional actions necessary to address solar access barriers. Additional actions for DACs should minimally include enhanced community engagement, tenant and property owner education on solar benefits, and technical support for project implementation. Annual updates to Resource Allocation Plans should adjust allocation priorities and outreach efforts to ensure that geographic diversity goals and objectives are achieved throughout the duration of the program.

In tracking program allocations, we recommend that the Program Administrator adopt metrics to help guide outreach and technical support activities including:

- i. Number of solar installations (Projects reserved and Installed).*

²⁸ AB 693 Section 1(e).

- ii. Number of low-income renters receiving solar benefits (*Projects reserved and Installed*).
- iii. Number of CARE eligible customers reached by program (*Projects reserved and Installed*).
- iv. Amount of PV generation allocated to offset tenant usage (*Projects reserved and Installed*).
- v. Number of local hires from solar projects.

Counting Towards AB 327 Compliance

AB 693 provides that the Multifamily Solar Roofs program “may count toward the satisfaction of the commission’s obligation to ensure that specific alternatives designed for growth among residential customers in disadvantaged communities...”²⁹

The qualified properties under AB 693 represent a very small segment of the residential markets within DACs. Energy Division staff have reported that there are nine (9) million people residing in top 25% of impacted communities and that on average, 54% of the total population DACs are low-income³⁰ In contrast, there are fewer than 100,000 households residing in AB 693-qualified multifamily households in DACs within IOU jurisdictions.

If AB 693 adoption rates counted towards the special efforts under AB 327 it could skew the specific alternatives adopted pursuant to AB 327 to a narrow segment of the residential market in DACs. This is because AB 327 will likely target other market segments (e.g., single-family homeowners or renters, multifamily buildings that are less than 5 units). This result would be contrary to the intent of AB 327. And we therefore strongly recommend against counting AB 693 results towards AB 327 implementation goals.

Several parties have expressed a desire to target different market segments for the purposes of AB 327 since AB 693 is already targeted low-income multifamily tenants, and other programs with similar qualifying criteria could leave out market segments not targeted by AB

²⁹ AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(b)(1).

³⁰ Energy Division Staff Paper Presenting Proposals for Alternatives to the NEM Successor Tariff or Contract for Residential Customers in Disadvantaged Communities in Compliance with AB 327, June 3 2015. Low-income is defined as at or below 200% of the Federal Poverty Level, which corresponds with the income eligibility requirements of CARE.

693, be duplicative, and administratively burdensome.³¹ We recommend that the different residential market segments are considered separately in tracking solar adoption rates. For example, installations under the AB 693 program should not count towards AB 327 obligations if the specific alternative adopted pursuant to AB 327 targets single-family home owner or renters or low-income multifamily buildings with less than five units. This will ensure that AB 693 does not swallow up the 327 program in contravention to the mandate of both AB 327 and AB 693.

³¹ See, e.g., Greenlining Opening Comments on ALJ Ruling Seeking Comment on AB 693 pp. 5-6 (Nov. 2, 2015); GRID Opening Comments on ALJ Ruling Seeking Comment on AB 693 pp. 4-9 (Nov. 2, 2015); MASH Coal. Opening Comments on ALJ Ruling Seeking Comment on AB 693 pp. 2-6 (Nov. 2, 2015).

V. Tenant Allocations³²

AB 693 states that:

The commission shall require that the electricity generated by qualifying renewable energy systems installed pursuant to the program be primarily used to offset electricity usage by low-income tenants. These requirements may include required covenants and restrictions in deeds.³³

A priority of the Multifamily Solar Roofs program is for a majority of the generation from the solar energy system to offset electricity used and paid for by tenants. Compliance with this mandate can be accomplished by establishing design requirements for the solar energy systems supported by the program and does not require additional covenants or deed restrictions. The appropriate design of qualified solar energy systems at affordable housing properties must consider a number of factors that limit system sizing, and also balance the need to offset electricity use for both residential units and common areas to make the solar installation financial feasible for the property owner. We recommend that the design of the solar energy system consider the key factors listed below.

Tenant Electricity Usage

Designing a PV system at a multifamily property based on tenant usage can be complicated. Usage varies widely across units and to date access to tenant utility data has been limited. Caution is necessary to prevent system over-sizing to minimize financial risks to property owners.

California electricity usage is among the lowest per capita in the country. The California Public Utilities Commission (CPUC) reports that California's average residential electricity usage was 542 kilowatt-hour (kWh) per month in 2014, and was 519 kWh per month in 2015.³⁴ This finding is consistent with a report prepared by Evergreen Economics for the Energy Savings

³² Questions 13 and 14 of the ALJ's July 8, 2016 Ruling are covered in this section.

³³ AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(f)(2).

³⁴ Reagan R. Rockzsfforde and Marzia Zafar, Geospatial Analysis of California's Utility Services, California Public Utilities Commission, May 23, 2016.

Assistance (ESA) and California Alternative Rate for Energy (CARE) programs, which reported that CARE customers in 2012 had an average electricity usage of 547 kWh per month.³⁵

In estimating tenant electricity usage in multifamily rental buildings it should be noted that the data in the referenced reports includes residential households in both multifamily and single family housing and therefore likely overstate household electricity use in multifamily rental buildings. There are several intuitive reasons why single family homes would have greater plug load and lighting use. Single family homes are larger than affordable multifamily units, have more physical space for more devices, and more occupants consuming energy services. Occupants in single family buildings also tend to have more household income to spend on increased amenities, such as additional devices or devices with premium features.

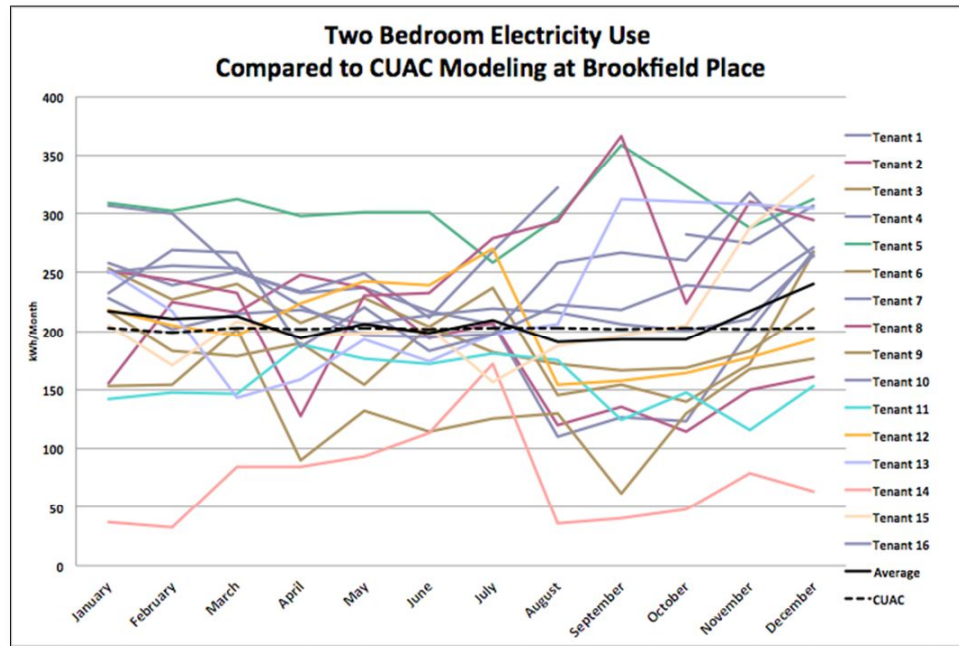
Further analysis is needed to estimate the multifamily electricity use once data is available from utility companies. To set a benchmark for the purposes of this proposal we estimated that per unit multifamily electricity use is on average 70% to 80% of the average residential usage in the state, or approximately 4,200 kWh to 4,800 kWh annually.³⁶ Assuming that 2kW of PV capacity is provided on average to each unit, the PV generation could offset 60% to 70% of each unit's electricity use.

Sizing of PV systems at multifamily properties must also consider wide differences in energy use among tenants at a multifamily site. The differences are illustrated in the chart below, which was contained in report prepared by Redwood Energy evaluating the accuracy of energy modeling for apartment complexes.³⁷

³⁵ Evergreen Economics, Needs Assessment for the Energy Savings Assistance and the California Alternate Rates for Energy Programs Volume 1: Summary Report, Final Report, December 16, 2013. Prepared for Southern California Edison, Pacific Gas and Electric, Southern California Gas, San Diego Gas and Electric and the California Public Utilities Commission.

³⁶ This estimate is generally consistent kWh usage seen in the large Multifamily Low Income Weatherization Program. The Association for Energy Affordability (AEA) has developed a tenant kWh load estimation tool using the 2009 Residential Appliance Saturation Study (RASS). The RASS The study yielded energy consumption estimates for 27 electric and 10 natural gas residential end-uses and appliance saturations for households.

³⁷ Redwood Energy, Is the Modeling Produced by the California Utility Allowance Calculator Accurate? A Study of Seven Apartment Complexes, September 15, 2013.



The chart above reinforces that in implementing the Multifamily Solar Roofs Program caution should be taken to ensure that PV installations are not designed to offset 100% of the aggregated tenant use at a multifamily property. Doing this would result in some tenants being allocated more credits than they could use during a year. Because all of the credits generated cannot be used to offset electricity use, the cost-effectiveness and economics of the investment is reduced. Based on the variations seen in the analysis conducted by Redwood Energy, we recommend that offsets to aggregated tenant loads be capped at 70% pending further analysis to determine more precise PV scaling criteria for PV systems in multifamily buildings. In this regard, energy data sharing requirements under AB 802 can assist property owners in normalizing tenant electricity usage to prevent system over-sizing.

Utility Tariffs

The economics of solar energy systems are also affected by utility tariffs. PV systems serving common areas have greater grid parity than low-income rental units because of significant differences in the utility rate structure. Additionally, as Time-of-Use (TOU) tariffs are adopted with later peak periods, the underlying economics of stand-alone PV systems is adversely affected. In these circumstances, more integrated energy strategies that combine

energy efficiency and energy storage with solar installation are necessary to ensure that the investment remains cost effective and preserves and enhances the value of the investment to the tenants and property owners. The changing economics of the solar energy system is addressed in more detail in the proposal's discussion of solar energy systems in Section XI. These economics considerations should be reflected in the design of the solar system.

Common Areas at Qualified Multifamily Properties

Qualified multifamily properties have both residential units and common areas that are used by residents. Common areas include reception areas, multi-purpose rooms, laundries, hallways, elevators, stairways, and parking area. While the legislation's clear focus is on the electricity usage within residential units, AB 693 does not exclude coverage of other building areas used by tenants. Moreover, because participation in the program is at the election of the owners of affordable housing properties, who typically are most motivated by the prospect of reducing electrical costs for owner-metered areas, coverage of common areas cannot be excluded without materially and adversely affecting program participation. Reducing electrical costs in common areas of rent-restricted affordable housing also has the ancillary benefit of reducing operating costs and therefore the need to increase rents over time. In summary, we recommend that the Multifamily Solar Roofs Program provide sufficient flexibility to offset common area electricity usage for owners to participate in the program.

Master-Metered Properties

The requirements enacted by AB 693 do not specifically exclude master metered properties. Indeed, AB 693 only requires that solar system be "primarily used to offset electricity usage by low-income tenants" and not entirely offset tenant usage.³⁸ The program's stated priority of offsetting tenant electricity usage is fulfilled whether or not the electricity is directly metered to the tenant or provided to the tenant by the property owner.

³⁸ Cal. Pub. Res. Code § 2870(f)(2) (emphasis added); See also Cal. Pub. Res. Code § 2870(g) (stating the requirement for when tenants participate via VNEM in a separate section of the bill, indicating that that there are two requirements under the bill: one for when the common areas are served – that the system primarily offset tenant load - and another describing the bill reductions and direct economic benefits the tenants receiving the primary offset must receive).

Excluding master-metered properties would be detrimental to low-income renters. In the context of California's affordable multifamily inventory, master metered properties typically include older buildings, which have higher energy use, and buildings that provide housing for special needs or at risk housing populations such as the elderly, persons with disabilities, single-room occupancy housing, and transitional housing for the homeless. These properties are highly vulnerable to utility cost increases, which can adversely affect the property's financial stability and affordability. Excluding these properties would run counter to AB 693's express purpose of providing assistance to low-income customers to make sure they can afford to pay their energy bills, reducing energy bills for CARE customers, and making solar systems more accessible to low-income and disadvantaged communities.³⁹

Additionally, for master-metered buildings, the installation of solar energy systems to offset electricity used by tenant is an important strategy for making operating funds available to provide tenant services, make building improvements, and preserve affordable housing options for vulnerable at-risk populations. We view these outcomes as tenant benefits under AB 693. This is especially important for non-profit housing organizations, which are subject to added restrictions requiring property income to be used for tenant services and building improvements.

While we do not have a precise count of affordable multifamily rental properties that are master-metered because of database limitations, we estimate that approximately 20% of the affordable housing inventory is master-metered for the electricity used by low-income tenants. The Commission should not exclude this significant portion of the low-income multifamily market and its vulnerable tenants in need of the benefits of going solar.

Criteria for Criteria Designing Solar PV Systems and Sizing Incentives

To address the issues discussed above, we recommend that the Multifamily Solar Roofs Program set criteria for the design of solar systems that are supported through the program's incentive structure. Specifically, we recommend that the following criteria be adopted to ensure that solar energy systems are properly sized and that incentives are appropriately

³⁹ See AB 693 Section 1(a), (b), & (e).

targeted to solar energy systems that offset electricity used by or paid for by low-income renters, while providing flexibility to address site conditions that limit the ability of the property owner to adequately serve both residents and common areas, and circumstance that affect the financial feasibility of the solar installation:

- *Balanced Solar Design:* The design of the solar systems should balance the needs of both the residents and property owners to ensure the project's financial feasibility as well as the owner's motivation to participate in the program.
- *PV Allocation:* At least 51% of the electricity generation should be allocated to residential units unless site conditions limit the sizing of the PV system.
- *Tenant Area Service:* Solar energy systems serving residential units should be limited to 70% or less of the aggregated tenant electrical usage at the qualified multifamily site to prevent system over sizing, and should factor in reductions to consumption from energy efficiency improvements and benefits accrued through storage devices when applicable.
- *Common Area Service:* Solar energy systems serving property common areas may offset up to 100 percent of common area electrical demands after considering tenant offsets and factoring in energy efficiency improvements.
- *Master Metered Buildings:* Master-metered buildings may participate in the program on the condition that energy savings from the installed solar energy systems be used to pay for support services provided to tenants, energy efficiency improvements in residential units, or other building improvements benefiting tenants.
- *Properties with Site Limitations:* Properties with site conditions limiting the ability to serve both residential units and common areas may increase the allocation of PV generation to offset common area use to the extent needed to ensure that the solar energy installation is financially feasible.
- *Allocations to Tenants and Other Qualified Multifamily Sites:* PV generation from a solar energy system installed at a qualified multifamily site may be allocated to low-income tenants at another qualified multifamily property that is owned by the same nonprofit housing organization and within the same utility jurisdiction.

Documentation and Verification of Allocation

Allocations for solar energy systems and updates to system design and allocations should be submitted to the Program Administrator as part of the application, reservation, and payment process. Minimally, the documentation should provide:

- PV system size and design detail (number of modules, inverters, annual kWh, etc.).
- PV allocations for tenant residential units and for common areas (annual kWh and percent of total).
- PV offsets for tenant residential units and for common areas (annual kWh and percent of total).
- Number of units at property and number receiving a direct PV allocation.

- PV allocations by unit type or size (annual kWh and percent of allocation by unit type).
- Other offsets provided to tenant residential units and for common areas from energy efficiency and energy storage systems (annual kWh and/or annual kW).
- Explanation of site condition affecting solar energy system allocations.
- Explanation if less than 100% of the units receive allocations from the solar energy system.

The Program Administrator should conduct periodic reviews to verify that the electricity generated by incentivized systems is offsetting electricity usage of low-income tenants. This can be accomplished as part of the energy benchmarking required under AB 802, which reflects utility data provided by utility companies on the energy usage and solar allocations recorded on utility meters at the property. We recommend that the property owner can be required to provide reports from energy benchmarking systems to the Program Administration for a prescribed period following the installation of a solar energy system. Should further analysis be required, the Program Administrator could request utility data from the respective utility companies or conduct selected site audits of utility billing records to verify compliance.

VI. Tenant Benefits⁴⁰

Under the Multifamily Solar Roofs Program, the economic benefits from the electricity allocated to tenants from a solar energy system installed at a qualified affordable multifamily rental property must be provided to tenants residing at a qualified multifamily property as a credit on their utility bills.⁴¹ In this regard, AB 693 provides that:

The commission shall ensure that utility bill reductions are achieved through tariffs that allow for the allocation of credits, such as virtual net metering tariffs designed for Multifamily Affordable Solar Housing Program participants, or other tariffs that may be adopted by the commission pursuant to Section 2827.1.⁴²

Virtual Net Metering

Multifamily individually metered renter households are a challenging segment for solar PV adoption due to the problem of distributing the benefits of system output among individually metered occupants. To address this issue, the CPUC directed the IOUs to file tariffs for Virtual Net Energy Metering (VNEM).⁴³ The specific intent of VNEM was to help low-income residents receive direct benefits from a solar system installed at a multifamily property. Based on the merits of these tariffs, the CPUC expanded VNEM to all multi-tenant, multi-meter properties in 2011 and included all NEM-eligible technologies for eligibility.⁴⁴ The CPUC reports that as of the end of 2015 there were over 274 (*non-MASH*) VNEM projects using a VNEM tariff with a combined capacity of 8.1 MW.⁴⁵ Given that VNEM is a well-established and successful mechanism for distributing the benefits of system output among individually metered occupants, we recommend that VNEM tariffs be used for the Multifamily Solar Roofs Program with modifications to address the following issues:

- *Effect of Non-Bypassable Charges and Design of TOU Rate Structures* – The CPUC final decision in the NEM 2.0 proceeding requires that NEM successor customers pay for

⁴⁰ Questions 13 and 14 of the ALJ's July 8, 2016 Ruling are covered in this section.

⁴¹ AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(g)(1) states, "low-income tenants who participate in the program shall receive credits on utility bills from the program."

⁴² AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(g)(1).

⁴³ D.08-10-036

⁴⁴ California Solar Initiative Annual Program Assessment, June 2016. California Public Utilities Commission.

⁴⁵ Ibid.

Non-Bypassable Charges (NBC) on all energy consumed from the grid. NBCs are used to support low-income energy services and program. We generally support the use of NBC in the program, but requests that the Commission consider impacts of NBCs in the design of TOU tariffs for low-income tenants. NBC's would equate to an added two cents or more per kWh. For a low-income household on CARE, NBCs would add 15% to 20% to a CARE household's utility bill. Coupled with a requirement to convert to TOU rates, and new utility rate structures that move peak periods to evening hours, the added charges and utility costs will substantially diminish the financial benefits of the program. Accordingly, we recommend that the VNEM tariffs incorporate TOU rate structures that do not adversely affect the economic benefits that would otherwise be received by tenants.

- Tenant Aggregation at Qualified Multifamily Sites – The tariff rate design for the Multifamily Solar Roofs program should also recognize that mid-rise and high-rise multifamily dwellings are not well aligned with the objective of scaling PV systems to offset tenant electricity loads because of roof space limitations and other site conditions. These conditions primarily affect properties located in denser more urban areas and new infill developments located along transit corridors, which are supported by investments from other Cap and Trade programs. To provide solar access to low-income tenants in these properties a tariff structure is needed to permit the generation from solar energy systems at a qualified multifamily site to be shared with low-income tenants residing at other qualified multifamily properties that are unable to provide solar to tenants because of site constraints.

We recommend that nonprofit controlled affordable multifamily property owners with multiple qualified properties in their inventories be permitted use AB 693 incentives to develop solar installations at one or more qualified multifamily sites that are scaled to serve low-income tenants residing at other qualified multifamily sites owned by the same nonprofit controlled housing organization and within the same utility territory.

Under this approach, which is similar to tariffs adopted in Massachusetts⁴⁶ and permissible under California law⁴⁷, the property owner would provide written notice to

⁴⁶ See Massachusetts Green Communities Act. Can be viewed at <https://malegislature.gov/Laws/SessionLaws/Acts/2008/Chapter169>

⁴⁷ AB 693 only requires that the “qualifying solar energy system” be installed on eligible properties, and that those systems “primarily ... offset electricity by low-income tenants [of eligible buildings].” See Cal. Pub. Res. Code § 2870(a)(3) & (4), (f)(1) & (2). In turn, AB 693 defines “solar energy system” by the criteria in Cal. Pub. Res. Code section 25782, which requires in relevant part: (1) The solar energy system is intended primarily to offset *part* or all of the consumer’s own electricity demand; and (2) The solar energy system is located on the same premises of the end-use consumer where the consumer’s *own* electricity demand is located. Cal. Pub. Res. Code § 25782(2), (5) (emphasis added). These sections therefore only require that the building owner’s own usage, the common area meter(s) connected to the solar system, need to be partially offset. The tenants would not have to be onsite, however, because tenants would always receive bill credits via VNEM on individually metered properties. In other words,

the Program Administrator and utilities of the other qualified multifamily properties that would be served by the system, the meter information for the tenants at the secondary sites, and designate the amounts of the credits allocated to such customers similar to what is required under VNEM.

- Tenant Contributions for Solar O&M – To the extent that the program incentives and energy savings from common areas are not available or sufficient to cover ongoing operation and maintenance (O&M) costs for the solar energy system inclusive of equipment replacement, a mechanism is required to facilitate the collection of contributions from tenants so that the O&M costs of the solar energy system can be covered.

Accordingly, we recommend that an O&M charge be incorporate in the VNEM tariff, and included on monthly utility bills along with the solar offsets and credits provided to the customer. The charge should reflect a per kWh estimate basis of reasonable and ordinary O&M costs and be billed on a per kWh basis based on the number of kWh offsets allocated to the tenant. The allowable O&M charges should not exceed two cents per kWh⁴⁸ or exceed 20% of the offsets, to ensure that tenants receive a direct economic benefit.

if the building owner is offsetting part of the common area load and the system is located on the eligible building where this offset is occurring, it meets the criteria of 25782(2) and (5). In addition, AB 693 only states that the system must primarily offset tenant load, but does not specify that those tenants must live in the same building where the system is sited. See Cal. Pub. Res. Code § 2870(f)(2). Moreover, AB 693 permits a VNEM tariff “such as virtual net metering tariffs designed for Multifamily Affordable Solar Housing Program participants or other tariffs that may be adopted by the commission pursuant to Section 2827.1.” Cal. Pub. Res. Code § 2870(g)(1). Accordingly, the VNEM tariff need not be identical to the MASH VNEM tariff, which limits credits to onsite tenants, because the VNEM tariff could be developed in the “disadvantaged communities” portion of AB 327. Furthermore, although not adopted by the Commission in Phase I, the Joint Solar Parties and the Energy Division Staff proposed varying versions of expanded VNEM that would allow the allocation of bill credits to offsite tenants within the same IOU service territory and with the same census tract in the same IOU service territory, respectively. See Administrative Law Judge’s Ruling Accepting Into the Record Energy Division Staff Papers on the AB 327 Successor Tariff or Contract, Attachment 2: Energy Division Staff Disadvantaged Communities Proposal for AB 327, p. 2-12 (June 4, 2015); Joint Solar Parties Proposal, p. v (Aug. 3, 2015). These proposals are still under consideration and as such, the Commission should not foreclose the possibility that AB 693 could include an expanded VNEM tariff that would allow off-site eligible low-income tenants to receive VNEM credits from a system located on another building owned by the same building owner. This tariff would be similar to net energy metering aggregation, although the properties would not need to be contiguous.

⁴⁸ Current O&M charges are estimated at \$0.02/kWh. The collection of O&M charges would be provided to property owner and retained in a reserve account for scheduled maintenance and equipment replacement.

Utility Allowances

There is considerable confusion regarding utility allowances in the various AB 693-eligible affordable housing programs and whether applicable utility allowance policies and guidelines can operate to reduce or eliminate prescribed solar benefits to low-income tenants. In affordable housing, the total amount of regulated rent paid by tenants includes both housing costs and a reasonable amount of utilities. Where the tenant pays utility costs directly to the utility provider, owners must provide a utility allowance to credit tenants for a reasonable estimate of those costs. The utility allowance is not equal to the actual costs paid by each tenant. These allowances vary by unit size, and depend on the rules applicable to each program. Utility allowances are updated periodically, usually annually. Over time, if utility allowances are increased to reflect increased utility costs, such as rate increases, the amount of the tenant rent paid to the owner decreases by the same dollar amount. Conversely, if the utility allowance is decreased for any reason, possibly including reduced electricity costs from a solar installation, the amount of the tenant's rent payment to the owner may increase. Whether reduced electricity costs due to solar must or could trigger changes in the utility allowances at a specific affordable property depends on the type of utility allowance methodology being used under applicable program rules, and whether that methodology can be changed by the owner.

For most AB 693-eligible affordable housing properties, utility allowances are determined in either of two ways, using: (1) "project-specific" methodologies, such as actual consumption billing data or energy modeling at the specific property; or (2) a schedule, usually provided by the local Public Housing Authority (PHA), which is based upon community-wide data that reflects utility consumption in the overall housing stock. Generally, properties that have rental assistance under a HUD or Rural Development (RD) program (e.g., project-based Section 8 or RD Rental Assistance) must use a project-specific methodology, usually actual consumption data. This category includes those Low-Income Housing Tax Credit properties that also have HUD or RD Rental Assistance. Most affordable properties supported by LIHTC or Project-Based Vouchers use a PHA schedule, although a small number of LIHTC properties

developed since 2009 have elected to establish a project-specific allowance using a TCAC-approved energy consumption model, the California Utility Allowance Calculator (CUAC).

In the MASH program, adjusting utility allowances was seen as part of that program's financing strategy for LIHTC properties. Under that program, because incentive levels were not sufficient to cover the costs of solar installations serving low-income tenants, the MASH program explicitly permitted property owners to adjust (lower) utility allowances through a special process created by the California Tax Credit Allocation Committee (TCAC) for recipients of MASH funding. This restricted process requires MASH projects seeking utility allowance adjustments to undergo an analysis using the California Utility Allowance Calculator (CUAC) to set the adjustment level. The adjustments would increase the tenant's rent payment to the property and thereby increase the cash flow to the property owners to support improvement costs (or increase the property's Net Operating Income).

This approach proved unsuccessful for a number of reasons,⁴⁹ and since the MASH 2.0 program was launched nearly a year ago, TCAC has processed relatively few utility allowances adjustments.⁵⁰ Moreover, utility allowance adjustments to accommodate solar are not possible for HUD-assisted or USDA Rural Development (USDA-RD) properties under the MASH program. These agencies have no clear policy on whether or how allowances can or should be adjusted to account for MASH-required direct tenant benefits, and on how any subsidy savings to the agency from any allowance reductions that might occur can be shared with owners to cover gaps in financing installations.

Under the requirements set by AB 693, in contrast to MASH 2.0, all of the solar generation allocated to tenants is intended to provide direct offsets providing economic benefits to the tenants. Further, under AB 693, "the commission shall ensure that electrical corporation tariff structures affecting the low-income tenants participating in the program

⁴⁹ Problems encountered included the absence of project-specific methodologies capable of providing shared savings to both tenants and owners (in the case of HUD properties), inconsistent Public Housing Authority utility allowance schedules resulting in lower adjustments from solar, public policies requiring the use of different utility tariffs in calculating utility allowances resulting in cost increases to baseline utility cost estimates, the cost and complexity of CUAC administration, and modeling uncertainties.

⁵⁰ According to the California Tax Credit Allocation Commission, there are currently up to 20 projects undertaking utility allowance reviews using the CUAC, and as of June 2016 only one existing LIHTC property installing a MASH 2.0 solar project received approval for a utility allowance adjustment.

continue to provide a direct economic benefit from the qualifying solar energy system.”⁵¹ As such, the CPUC should carefully evaluate the effect of utility allowance policies to determine whether or not such policies or practices would affect the actual economic benefits received by low-income tenant households.

Our preliminary assessment is that AB 693’s tenant benefit requirement will not be materially impacted for the vast majority of qualified multifamily properties:

- **LIHTC properties** – LIHTC properties comprise 70% of the eligible multifamily property inventory. For these properties, owners typically set utility allowances using PHA utility allowance schedules. Because the PHA schedule is based on a community standard, the solar credits received by the tenant household would not affect the amount of the utility allowance. The other method available to LIHTC properties placed in service since 2009 is the California Utility Allowance Calculator (CUAC). Under this method the solar production allocated to tenants can be removed from the calculation, so that the resulting project-specific allowance is unaffected by PV offsets for tenant loads. Additionally, for solar installations funded under AB 693, this method would be available only for new construction projects. Existing LIHTC properties participating in the Multifamily Solar Roofs program are not able to use the CUAC under TCAC’s current policies. In summary, for LIHTC properties without HUD or RD rental assistance, the benefits provided to low-income tenants will not be adversely affected by federal housing policies and these benefits are currently safeguarded from recapture. To ensure that property owners using the CUAC do not inadvertently take solar credits intended for the sole benefit of the tenants, the Commission could require that solar credits be removed from utility allowance calculations.
- **HUD-assisted properties** – HUD-assisted properties comprise approximately 22% of the eligible inventory. Those HUD-assisted AB 693-eligible properties must use a project-specific actual consumption methodology to calculate utility allowances under HUD Multifamily Notice, H-2015-04.⁵² This methodology currently presents a potential conflict with AB 693’s tenant benefit requirements. Under this Notice, absent further modification, tenant benefits will be considered utility cost reductions driving commensurate reductions in utility allowances and increases in tenant rent contributions to owners. By reducing subsidy payments, and preventing owners from accessing the savings if needed, HUD will capture all of the AB 693-required tenant benefits from reduced electricity bills from low-income renters, in effect making HUD the beneficiary of the state’s investment and this program’s energy savings. HUD’s guidelines were established through an informal internal process (issuing a Notice), not through formal notice-and-comment rulemaking. Thus, HUD apparently has considerable discretion in setting methodologies or other guidelines for calculating

⁵¹ AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(g)(2).

⁵² HUD Notice H-2015-04, Methodology for Completing a Multifamily Housing Utility Analysis, June 22, 2015.

utility allowances for privately owned HUD-assisted properties. HUD could still establish revised guidelines to require owners to disregard the AB 693 solar offset or credit it back to tenants in their utility allowance calculations. HUD has been advised of this potential conflict, and on April 6, 2016 CHPC provided HUD an issue paper with specific recommendation to largely protect tenant benefits.

In summary, solutions within the discretion of the federal agency exist to resolve this conflict over HUD's capture of intended tenant benefits. Should HUD provide information to the contrary, the Commission can consider whether to adjust the program's tenant benefit requirements to accommodate HUD properties. In this regard, it should be noted that no such accommodation was provided for the MASH 2 program. Should an accommodation for the Multifamily Solar Roofs Program be considered, since HUD would be the primary beneficiary of the solar installations funded by the State of California, the Commission should consider what level of financial contribution is appropriate from HUD or HUD property owners to reduce the level of state incentives commensurate with the reduction in benefits provided to California renters.

- **Actions Required to Safeguard Tenant Benefits from Utility Allowance Recapture** – To ensure that publically regulated utility allowance policies do not conflict with AB 693's tenant benefit provisions, we recommend the CPUC and the Program Administrator take the following steps:
 - i. Require owner certifications that a utility allowance reduction or increase in tenant rent payment will not be undertaken as a result of the installation of the solar energy system.
 - ii. The Commission should effectuate state policy by advocating that HUD, USDA-RD and other state, federal, and local agencies not count the directed tenant benefits as income in determining the tenant's rent contribution.
 - iii. The Program Administrator should conduct periodic monitoring and verification of housing types with known utility allowance policy conflicts to ensure that utility allowances are not reduced as a result of the solar energy system funded under AB 693.
 - iv. Ensure that if utility allowance reductions are allowed by the Commission as a result of the installation of a solar energy system funded under AB 693, there is a corresponding decrease in the level of incentives paid.

Documentation and Verification of Tenant Benefits

AB 693 requires that:

“The commission shall ensure that electrical corporation tariff structures affecting the low-income tenants participating in the program continue to provide a direct economic benefit from the qualifying solar energy system.”⁵³

To implement tenant benefit requirements for the Multifamily Solar Roofs Program we recommend that the Commission require:

- *Affidavit of Compliance with Tenant Benefit Requirements* – Property owners must certify that they will not undertake a utility allowance reduction or increase to tenant rent payments as a result of the installation of the solar energy system during the ten-year period following installation.
- *Program Administrator Due Diligence* – The Program Administrator must conduct reasonable due diligence to determine that tenants will receive and continue to receive a direct benefit under the program. The due diligence should include assessments of:
 - i. Solar PV offset provided to tenants
 - ii. Added costs paid by tenants for additional charges or fees or utility rate changes resulting from the installation of a solar energy system at the property
 - iii. Net economic benefit received by the low-income tenants
- *Transparency* –As benefit recipients, tenants should be allowed to verify that promised tenant benefits are actually delivered. Calculations of tenant benefits and supporting documents for the property should be made available to tenants or their representatives.

⁵³ AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(g)(2).

VII. Solar Financing and Ownership Structures⁵⁴

In general, affordable housing property owners and tenants prefer PV system ownership to Third Party Owner (TPO) transactions. Purchasing options provide lower long-term kWh costs and greater financial benefits to property owners and tenants, even with financing costs, and pose less out-year financial risk in comparison to TPO agreements that may contain cost escalators to bolster investor returns. However to accomplish system ownership objectives property owners require either deeper incentives or off-book project financial tools, such as on-bill financing, to cover costs.

TPOs can offer important options where property financing or off-book financing options are not available to cover solar project costs. Owners of rent restricted affordable multifamily housing need **one-stop** alternatives that provide access to financing with no front-end costs. Large solar companies with financing and investment funds capable of delivering integrated solar services typically provide these options. These options may be less available for smaller solar companies to participate in this program.

A number of affordable housing organizations have sought to develop their own investment entities to enable portfolio financing of solar projects, but these structures are complex and costly to develop, and further assistance is need to bring this mechanisms on line. In either type of transaction – property purchase or TPO – affordable housing owners seek sufficient upfront resources to minimize the cost of the solar investment to the property, increase the value of the investment, and minimize financial risk. Because the benefits from resident-serving solar energy systems must be retained by the low-income beneficiaries of the program, property owners generally require that the cost of solar energy systems serving residential units either be fully funded from incentives and any other resource that can be reasonably leveraged.

Additionally, property owners are concerned about how operations and maintenance (O&M) costs for the solar systems will be covered. Assuming that O&M costs are \$0.02/kWh, O&M costs for a 150 kW PV system could average over \$5,000 per year. Without a source to cover this cost, added O&M costs put a financial burden on the property; thereby discouraging

⁵⁴ Questions 11,15, and 16 of the ALJ's July 8, 2016 Ruling are covered in this section.

installation or, if not anticipated in the financial analysis, places the property at risk. Funding for O&M costs must be addressed in order for AB 693 implementation to be successful.

Ownership Pathways

The most direct way for property owners to own solar energy systems is where the property owner is leveraging Low Income Housing Tax Credits and federal investment tax credits as part of new construction or project refinancing and recapitalization. LIHTC-financed new construction and rehabilitation projects in particular provide opportunities to leverage resources in conjunction with the Multifamily Solar Roofs Program to install solar energy systems. In 2015 alone, the TCAC awarded LIHTCs worth well over \$2.5 billion to 221 new affordable housing properties and over 18,000 low-income residential units. By targeting projects receiving LIHTC funding, the Multifamily Solar Roofs program could lower average incentive payments and optimize the reach of the program. In order to target LIHTC properties and leverage this financing effectively, however, incentive reservation periods for the Multifamily Solar Roofs Program will need to be 18 to 36 months to match the longer development periods associated with these larger construction projects.

Additionally, the LIHTC program encourages the adoption of above-code energy building standards for new construction,⁵⁵ and rehabilitation projects include energy efficiency investments to improve energy efficiency by at least 15%.⁵⁶ Hence, properties with LIHTC funding will automatically meet the energy efficiency requirements adopted in AB 693.

Third Party Ownership Issues and Restrictions

There are a number of issues unique to TPO structures that should be addressed in the AB 693 program design should address including:

- *TPO MW and Funding Limitation Under the Multifamily Solar Roofs Program* – The ALJ asked specific question on whether program should place limits on the amount of

⁵⁵ In 2015, 58 of the 63 LIHTC funded new construction projects awarded 9% Tax Credits achieved LEED Gold or Silver standards,

⁵⁶ In 2015, all 27 LIHTC finding rehabilitation projects receiving 9% Tax Credit increases energy efficiency by 20% or more and 30% of the projects included added sustainability measures such as solar PV.

incentive payments that can be paid to projects developed by any one third-party owner, or whether the program should include a limit on the number of MWs for projects developed by any one third-party owner, supplier, or installer.

Under the MASH 2.0 program, some solar providers have sought to monopolize the affordable housing market through MASH's reservation system. This has resulted in more limited contractor participation and has locked out some affordable housing properties wishing to participate in the program. Accordingly, we recommend that the Program Administrator phase the Solar Roofs application and reservation process during a year and limit the number of project reservations that a solar contractor or supplier or their affiliates can encumber during these periods, to build a more diverse and viable solar market for affordable housing.

To address this problem the following corrective actions are necessary:

- i. Discontinue the practice of allowing solar companies to enroll multiple properties for a property owner at one time.
 - ii. Require that multifamily property owners make project applications.
 - iii. Establish process to phase application approvals on a quarterly basis
 - iv. Set a limit on project reservations that a housing applicant can receive during a quarter.
 - v. Provide property owners with conditional (60day) reservations to permit housing organizations to obtain competitive bids from multiple solar contractors before locking in reservations.
-
- *TPO Pricing* – Where a TPO agreement is proposed, and a significant portion of the project's cost are covered by incentives and other financial contributions from the property, the TPO agreement should be structured as pre-paid agreement to ensure that the property owner and the low-income tenants receive credit for these AB 693 investments. Additionally, we recommend that the Program Administrator monitor per kWh charges set by solar providers under TPO agreements to ensure that the per kWh charges are aligned with the amount of project costs financed and reasonable financing charges. Moreover, because escalators in TPO agreements can adversely affect out-year financial returns for the property owners, we recommend that cost escalators be prohibited under the program.
 - *TPO Financial Projections* – The value of a TPO transaction is determined on the basis of the projected cash flow to the property owner. However, the reliance on cash flow projections can increase the risk to property owners, since the third party solar owners making the cash flow projection may be motivated to present more optimistic financial forecasts than actually supported to gain business by overstating savings estimates. This can occur in a number of ways:
 - i. Not projecting all or the costs required by the agreement or including or disclosing the costs of rate escalators over the agreement period.

- ii. Not properly correlating solar production with TOU rate structures.
- iii. Not fully accounting for utility demand charges, utility fees or tariffs rate changes.
- iv. Including savings from energy efficiency in financial forecasts.

Affordable housing owners serving low-income households under government imposed rent restrictions are both attracted by robust projections of future savings and ill equipped to cover gaps if financial projections are not achieved. For these reasons, we strongly recommend requiring robust information disclosures regarding projections about financial benefits and costs to protect this vulnerable market segment.

- *TPO Production Guarantees* – AB 693 requires that qualifying solar energy systems owned by third-party owners be subject to contractual restrictions to ensure that no additional costs for the system be passed on to low-income tenants and that third-party owners of solar energy systems provide ongoing operations and maintenance of the system, monitor energy production, and take appropriate action to ensure that the kWh production levels projected for the system are achieved throughout the period of the third-party agreement.⁵⁷

There are a number of practices that have been used by energy service contracting companies (ESCO) and solar PV companies to guarantee performance including providing specific annual guarantees of kWh production so that property owners are compensated for the amount of under production, or energy performance insurance, in which an insurance company guarantees performance levels. The Program Administrator should consult with the solar industry and other energy professions to determine the best options for ensuring that solar energy systems incentivized by payments from the Solar Roofs Program provide the production levels outcomes represented by the TPO.

⁵⁷ AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(f)(4).

VIII. Incentive Structure⁵⁸

The incentive structure mandated by AB 693 is fundamentally different from the traditional approaches utilized for the MASH and SASH programs where program funding and capacity targets strongly influenced the underlying incentive structure.⁵⁹ Specifically, AB 693 states that in developing an incentive structure for Multifamily Solar Roofs program:

“The commission shall ensure that incentive levels for photovoltaic installations receiving incentives through the program are aligned with the installation costs for solar energy systems in affordable housing markets and take account of federal investment tax credits and contributions from other sources to the extent feasible.”⁶⁰

This cost-based approach is necessary to ensure that the program has the capability to address financial barriers so that “solar energy systems [are] more accessible to low-income and disadvantaged communities,”⁶¹ and that low-income renters are provided “a direct economic benefit from the qualifying solar energy system.”⁶²

MW Goal Should Not Affect Incentive Level

AB 693’s goal to “install qualifying solar energy systems that have a generating capacity equivalent to at least 300 megawatts”⁶³ is reachable under the proposed program design but must be tempered by the practical considerations regarding how the goal was set and how the program is funded. The 300 MW goal set by AB 693 assumed full programmatic funding of \$100 million annually for a period of 10 years. However, the level of funding for the Multifamily Solar Roofs program is contingent on the level of revenues received from the Cap and Trade auctions of GHG allowances allocated to electrical corporations pursuant to subdivision (b) of Section 95890 of Title 17 of the California Code of Regulations. Because of the general uncertainty about actual program funding over the period covered by the program, the Multifamily Solar Roofs Program should not adopt a MW capacity goal or an interim MW capacity goal that might

⁵⁸ Questions 7,15,16 and 23 of the ALJ’s July 8, 2016 Ruling are covered in this section.

⁵⁹ D.15-01-027, January 9, 2015

⁶⁰ AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(f)(4).

⁶¹ AB 693. Section 1(e).

⁶² AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(g)(2).

⁶³ AB 693. Section 1(f).

adversely affect incentive levels necessary to install solar energy systems to reach low-income renters at qualified multifamily properties.

Design of Incentive Structure to Meet AB 693 Objectives

To meet the objectives of AB 693 and address the financial barriers association with solar PV installations serving low-income rental units, we recommend that the incentive structure incorporate the following principles:

- *Solar Cost Indexing* – Index solar costs for multifamily solar energy systems and reduce system costs by the annual percent reduction in solar installation costs or 7% per year over the program period pursuant to SB1,⁶⁴ whichever is less.
- *Tiered Incentive Structure* – Provide different incentive levels for common areas and tenant units and adjust incentive levels to reflect economies of scale.⁶⁵
- *System Ownership* – Promote incentive options that enable property ownership of the solar energy systems.
- *Tenant Systems*: Cover up to 100% of the costs for portions of the system providing generation and economic benefits to tenants adjusted for other sources funding the solar energy systems.
- *Common Area Systems*: Cover up to 70% of the costs of common area installations adjusted for other sources funding the solar energy systems.
- *Contributing Sources* – Provide different incentive levels that reflect contributions from the Federal ITC, LIHTC program, and other sources offsetting the costs of solar energy systems. To reflect transaction costs and uncertainty in tax credit calculation should be capped at \$0.80/per credit.
- *Property Contributions* – Require a minimum property contribution that is limited to 80% of the estimated energy savings from common area installations. Contribution can be satisfied on the basis of payments made toward towards O&M costs and rent payments under TPO agreements.
- *Pre-Paid Agreements* – For solar energy projects financed by TPO structures, require pre-paid agreements if 90% or more the indexed solar costs of the solar energy system are covered from incentives, tax credits and other tax benefits.

⁶⁴ Public Utilities Code, SEC. 5. Section 387.5(b).

⁶⁵ The economies of scale cost adjustments shown in Table 8 be modified consistent with the general findings in the LBNL Tracking the Sun VIII report.

- *Storage Devices* – Incentive structure for energy solar systems should be consistent with incentive provided under the SGIP and capped based on 75% of the PV generations and other system design considerations discussed in Section XI.

Alignment of Incentives with Solar Costs

The requirements that the program’s incentives be aligned with costs and take account of federal investment tax credits and contributions from other sources strongly suggest that the incentive structure be based on indexes of solar costs and funding sources available to support solar installations.⁶⁶

This required alignment of incentives to solar costs and other funding sources is a significant change and enhancement to what occurred under the MASH program. The MASH program evaluation reported that:

Despite declining installed system cost trends in the U.S. PV market, MASH system installation costs did not decrease over time. For comparison, SASH system installed costs decreased every year from 2011–2013.⁶⁷

In this regard, the Lawrence Berkeley Laboratory’s study, *Tracking the Sun*, provide some insights on why solar costs in certain residential markets have not declined at the same rate as other markets. The report found that “states with higher incentives and/or higher electricity rates may have higher installed prices as a result of value-based pricing.”^{68,69} This practice is very prevalent in solar transactions financed through Third Party Ownership (TPO) structures, such as Power Purchase Agreements (PPA), inclusive of the majority of solar installation under

⁶⁶ AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(f)(4).

⁶⁷ Navigant Consulting, California Solar Initiative—Biennial Evaluation Studies for the Single - Family Affordable Solar Homes (SASH) and Multifamily Affordable Solar Housing (MASH) Low - Income Programs Impact and Cost - Benefit Analysis Program Years 2011–2013, December 1, 2015. California Public Utilities Commission.

⁶⁸ Galen Barbose, Samantha Weaver, Naïm Darghouth, *Tracking the Sun VII: An Historical Summary of the Installed Price of Photovoltaics in the United States from 1998 to 2013*, Lawrence Berkeley National Laboratory, September 2014. http://eetd.lbl.gov/sites/all/files/tracking_the_sun_vii_report.pdf

⁶⁹ Value-based pricing refers to a practice used by solar companies to provide PV service agreements based on the value of the solar to the customer, rather than based on the actual costs of the solar system (hard costs, installation costs, and development fees). The presumption by solar companies using this practice is that if the cash flow benefits are large enough, a property will look past the actual installations costs and added project costs paid over the period of the agreement.

the MASH program. The absence of cost reductions and cost controls for this program should raise concerns that the full benefits of the reductions in solar costs were not received by the tenants, property owners, or ratepayers and instead may have been directed elsewhere. Given the experience with the MASH program, safeguards are needed to ensure that the intended beneficiaries of the program and ratepayers receive the benefits that would result from cost reductions.

Develop and Use a Solar PV Cost Index

To meet the requirement in AB 693 that incentives be aligned with solar costs, we recommend that the Commission or Program Administrator for the Multifamily Solar Roofs Program develop a Solar Cost Index. The solar index should be developed in consultation with Lawrence Berkeley National Laboratory (LBNL) and the National Renewable Energy Laboratory (NREL) to ensure that an objective cost baseline is set for the program.⁷⁰

As a starting point for estimating solar costs in California's residential markets, a recent report published by NREL⁷¹ provides a useful benchmark of installed prices of U.S. solar photovoltaic (PV) systems built in the first quarter of 2015 (Q1 2015). This report is the first in an intended series of annual benchmarking reports covering residential and commercial solar PV installations. The analysis used a bottom-up methodology to capture variations in system cost and price driven by a number of factors. This approach enables benchmarking of system costs independent from price, which as NREL points out "is critical in understanding industry progress in reducing costs over time." The segment-specific models and inputs used by NREL to benchmark PV costs were reviewed and validated by industry and subject matter experts via

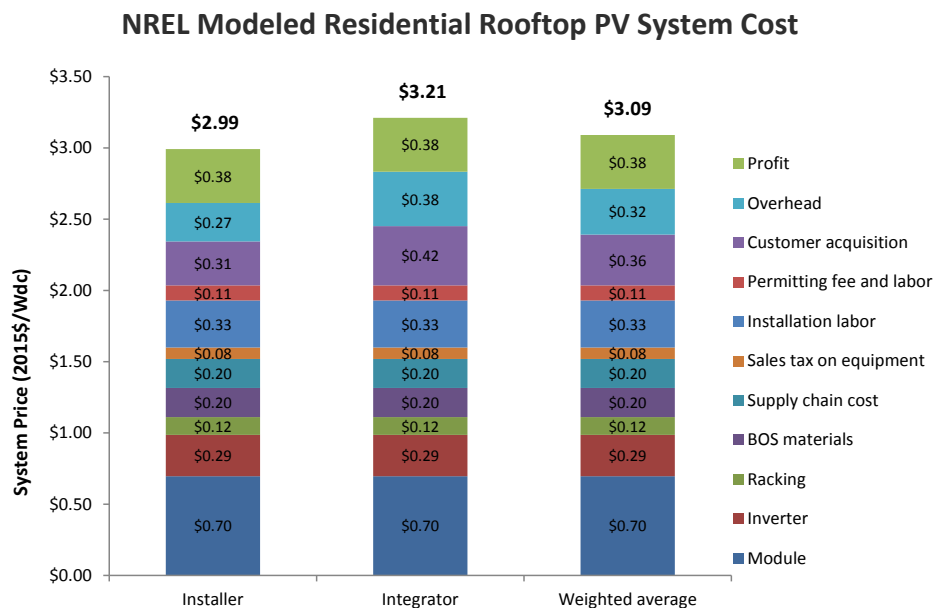
⁷⁰ LBNL has considerable expertise on performing solar costs analysis. The LBNL *Tracking the Sun* reports, developed with the Department of Energy, is a recognized reference of solar cost trends for grid-connected solar photovoltaic systems. The 2015 report includes data points from over 400,000 individual PV systems or 81% of all U.S. PV capacity installed through 2014.

⁷¹ Donald Chung, Carolyn Davidson, Ran Fu, Kristen Ardani, and Robert Margolis, U.S. Photovoltaic Prices and Cost Breakdowns: Q1 2015 Benchmarks for Residential, Commercial, and Utility-Scale Systems, September 2015. National Renewable Energy Laboratory. Technical Report NREL/TP-6A20-64746.

GTM Research, SEIA US Solar Market Insight Report. See:

<http://www.greentechmedia.com/research/subscription/u.s.-solar-market-insight>

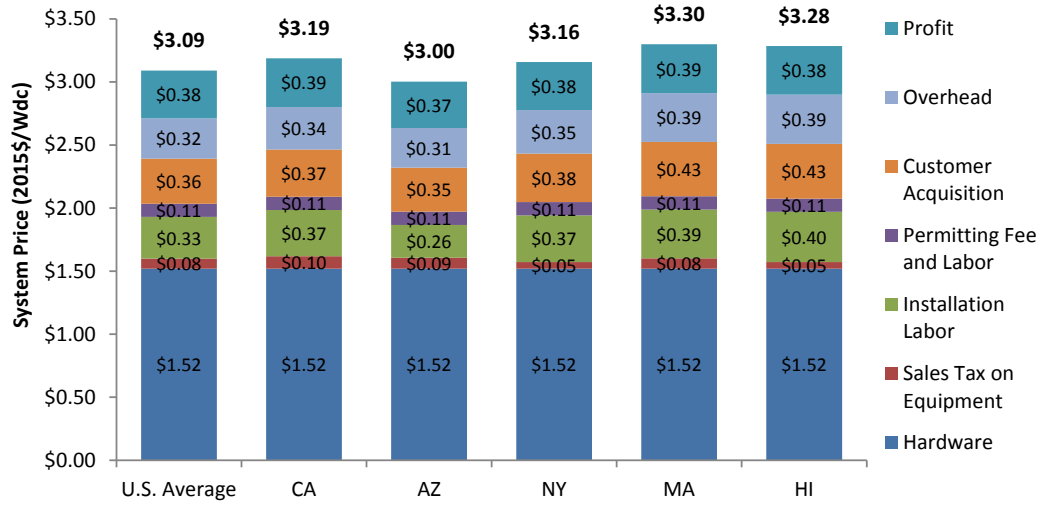
interviews as well as review of draft results. The findings of the analysis benchmarked residential solar PV costs at \$3.09/watt. A breakdown of these costs is shown below.



Source: NREL September 2015

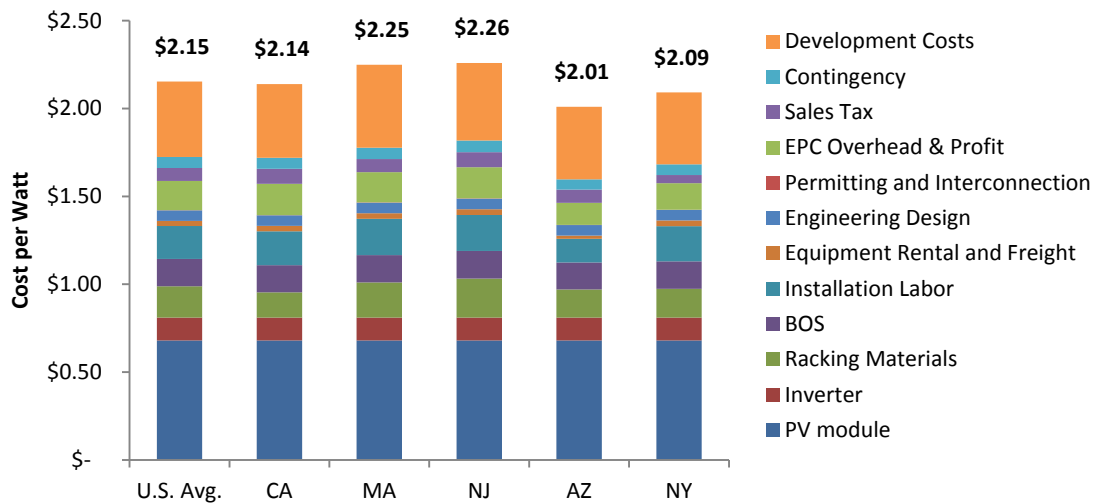
The NREL report also accounted for regional variations in solar costs for states including California and further analyzed the economies of scale gained as part of commercial installations for PV systems of 200 kW or more, which is a typical system size under the Multifamily Residential Roofs program. Aspects of this analysis are highlighted below.

Regional Variables in Residential PV System Cost



Source: NREL September 2015

Regional Variables in Commercial PV System Cost



Source: NREL September 2015

Recognizing that solar installations constitute a hybrid of the cost drivers for residential and commercial installation, we completed a review of NREL's report findings and LBNL's Tracking the Sun reports to develop an estimate of solar costs for multifamily rental properties. Based on this analysis we propose using a benchmarked PV systems costs of \$3.20/watt for the purposes

of modeling incentive levels in this proposal. Findings from this analysis are summarized in the table at Appendix D.

Funding Source Index

In addition to aligning incentive levels with solar costs, AB 693 also requires that:

The Commission shall ensure that incentive levels for photovoltaic installations receiving incentives through the program... account of federal investment tax credits and contributions from other sources to the extent feasible.⁷²

In this regard, the Low Income Weatherization Program (LIWP) Large Multifamily program⁷³ has developed an incentive structure that attempts to account for contributions from federal ITCs and the LIHTC program. This solar incentive structure for this program is shown in the in Tables 7 and 8 may be a useful model to emulate in the Multifamily Solar Roof Program. The incentive structure shown below assumed a \$3.50/watt cost for installed PV installations.

**Table 7 – LIWP Large Multifamily
Affordable Multifamily Housing Solar Incentives (Systems Less Than 100 kW)**

Funding Sources for PV			LIWP Incentives (\$/watt)	
Federal ITC	LIHTC	MASH	Property Metered Systems	Tenant Metered Systems
Yes	Yes	No	\$0.50	\$1.50
Yes	No	No	\$1.00	\$2.40
Yes	No	Yes	0	\$1.00
No	No	No	\$1.50	\$3.50
No	No	Yes	\$0.80	\$1.70

⁷² AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(f)(4).

⁷³ Program Guidelines for the Large Multifamily LIWP program are available at: <http://www.csd.ca.gov/Portals/0/Documents/LIWP/LIWP%20LMF%20Final%20Program%20Guidelines%20111015%20FINAL.pdf> and at <http://aea.us.org/efficiency-programs/low-income-weatherization-program-large-multi-family-ca.html>.

**Table 8 – LIWP Large Multifamily
Incentives Adjustments for PV Systems**
(Systems Over 100kW)

kW--DC	Incentive Adjustment Factor
≤100	100%
101--300	80%
301--500	60%
≥501	40%

This structure addresses AB 693’s requirement that the incentive structure be aligned with the costs of solar PV installations on multifamily properties and take account of other contributing resources, such as Federal Investment Tax Credits, that are available to reduce project costs. Accordingly, we recommend that a similar approach be used to create the incentive structure for the Multifamily Solar Roofs Program, inclusive of modifications to address AB 693’s program objectives.

Proposed Incentive Structure for AB 693

The Non-Profit Solar Coalition recommends that the Commission adopt the incentive structure proposed in the tables below. The proposal accounts for assumptions about project cost and funding resources that may be available to reduce incentive requirements. Backup analysis for the proposed incentive levels is provided in Appendix E.

- Solar PV Incentives for Existing Multifamily Properties Without LIHTC Financing for Solar Installation

Table 9 – AB 693 PROPOSED INCENTIVES
Existing Multifamily Properties Without LIHTC Financing

	Incentives for PV Installed for Tenant Units (\$/DC Watt)	Incentives for PV Installed for Common Area (\$/DC Watt)	Notes
Property Owned (Purchased or Financed) Systems	\$ 3.20	\$ 2.20	Property owned systems reflect property financial contribution for common area installations, financing costs, and system O&M costs, which is over 25% of overall costs.
Third Party Owned System	\$ 2.24	\$ 1.60	TPO system costs covered by property owner for either common area and tenant units. Property owner pay added costs under PPA commensurate with lower incentives.
Energy Storage	Devices > 10kW: \$0.50/watt hour Devices < 10kW: \$0.60/watt hour		Energy Storage capacity capped at 75% of PV generation.
Requirements	<ul style="list-style-type: none"> ▪ PV system benefits tenants. ▪ PV system design includes energy efficiency reduction estimates. ▪ All systems installations include O&M service provided by the property owner or third-party owner of solar system. ▪ Solar contractors installing solar systems must include or other warrantee of system production for 10-years performance guarantee or other requirements. ▪ Per kWh charges under PPA agreement should not exceed the estimated energy cost savings from PV systems serving common areas. ▪ Contractor local hiring and property energy efficiency requirements address separately in proposal. ▪ Affidavit by property owner attesting that property will be subject to affordability for at least 10 years and that tenant benefits will not be recaptured by increases in rent payments. 		

- Solar PV Incentives for Multifamily Properties With 4% LIHTC Funding for Solar Installations

Table 10 – AB 693 PROPOSED INCENTIVES
Existing Multifamily Properties With 4% LIHTC Financing

	Incentives for PV Installed for Tenant Units (\$/DC Watt)	Incentives for PV Installed for Common Area (\$/DC Watt)	Notes
Property Owned (Purchased or Financed) Systems	\$ 1.92	\$ 1.28	Property owned systems reflect property financial contribution for common area installations, financing costs, and system O&M costs, which is approximately 30% of overall costs.
Third Party Owned Systems	\$ 0	\$ 0	Not cost effective.
Energy Storage	Devices > 10kW: \$0.50/watt hour Devices < 10kW: \$0.60/watt hour		Energy Storage capacity capped at 75% of PV generation.
Requirements	<ul style="list-style-type: none"> ▪ PV system benefits tenants. ▪ PV system design includes energy efficiency reduction estimates. ▪ All systems installations include O&M service provided by the property owner or TPO of the PV system. ▪ Solar contractors installing solar systems must warranty or guarantee PV production for at least 10-years. ▪ Contractor local hiring and property energy efficiency requirements address separately in proposal. ▪ LIHTC Tax Credit contributions for solar project capped at \$0.80/per tax credit to allow for transaction costs and fluctuations in pricing over time. ▪ Affidavit by property owner attesting that property will be subject to affordability for at least 10 years and that tenant benefits will not be recaptured by increases in rent payments. 		

- Solar PV Incentives for Multifamily Properties With 9% LIHTC Funding for Solar Installations

Table 11 – AB 693 PROPOSED INCENTIVES
Existing Multifamily Properties With 9% LIHTC Financing

	Incentives for PV Installed for Tenant Units (\$/DC Watt)	Incentives for PV Installed for Common Area (\$/DC Watt)	Notes
Property Owned (Purchased or Financed) Systems	\$ 0.25	\$ 0.25	Over 90% of systems costs paid for by the property.
Third Party Owned System Installations	\$ 0	\$ 0	Not cost effective
Energy Storage	Devices > 10kW: \$0.50/watt hour Devices < 10kW: \$0.60/watt hour		Energy Storage capacity capped at 75% of PV generation
Requirements	<ul style="list-style-type: none"> ▪ PV system benefits tenants. ▪ PV system design includes energy efficiency reduction estimates. ▪ All systems installations include O&M service provided by the property owner or TPO of the PV system. ▪ Solar contractors installing solar systems must warranty or guarantee PV production for at least 10-years. ▪ Contractor local hiring and property energy efficiency requirements address separately in proposal. ▪ LIHTC Tax Credit contributions for solar project capped at \$0.80/per tax credit to allow for transaction costs and fluctuations in pricing over time. ▪ Affidavit by property owner attesting that property will be subject to affordability for at least 10 years and that tenant benefits will not be recaptured by increases in rent payments. 		

▪ Solar Adjustment Factors

We further propose that the incentive levels proposed in the tables above be adjusted based the following factors listed below.

**Table 11 – AB 693 PROPOSED INCENTIVES
Solar Incentive Level Adjustment Factors**

Annual Solar Cost Adjustment	
<u>Recommendation</u>	<u>Adjustment Incentive Amount</u>
<ul style="list-style-type: none"> ▪ Make incremental adjustment to incentive levels to reflect project economies of scale 	<p>Incremental reductions to proposed solar PV incentive levels reflect labor and other cost reductions due to economies of scale savings documented in NREL report.</p>
- Systems less than 200 kW	No changes in incentive level.
- <i>Systems Over 200 kW but less than 300 kW</i>	85% of recommended incentive
- <i>Systems over 300 kW but less than 400 kW</i>	75% of recommended incentive level.
- <i>Systems over 400 kW</i>	70% of recommended incentive level.
<u>Recommendation</u>	<u>Adjustment Incentive Amount</u>
<ul style="list-style-type: none"> ▪ Make annual adjustment to incentive levels to reflect solar cost reductions 	<p>Pursuant to Section 387.5 of the Public Utilities Code, solar incentive amount should decrease by the percent decline in residential solar costs as reported by LBNL, or by 7% as required in SB 1.⁷⁴</p>

⁷⁴ Public Utilities Code, SEC. 5. Section 387.5(b).

Including Energy Efficiency and Storage Devices Under AB 693 Will Help Meet or Exceed the 300 Megawatt Solar Goal

To determine whether the proposed incentive levels for solar energy systems is aligned with the goal of installing “solar energy systems that have a generating capacity equivalent to at least 300 megawatts,”⁷⁵ we undertook an analysis of the proposed incentive structure. In this analysis we considered whether potential investments in energy storage and energy efficiency could also be made along with the investments in solar PV and still meet the 300 MW target for the program.⁷⁶

The analysis shows that the 300 MW goal can be reached, or be surpassed, under the proposed incentive structure and that investments in both energy efficiency and storage to solar PV could be included with the installation of solar PV as part of the integrated energy strategy described in this proposal, and reach the 300 megawatt target.

- *Assumptions:* In the analysis we assumed that 10% of funding allocated for the Multifamily Solar Roofs Program is provided for program administration costs. We also made the assumption that an additional 10% of the funding allocation could be used to support energy efficiency measures as a result of funding shortfalls in other energy efficiency programs.⁷⁷ From this baseline, \$80 million annually would be available for investments in solar energy systems (Solar PV+Energy Storage).

Under the investment structure, the highest level of solar PV incentives proposed is for property owned solar energy systems at existing multifamily properties. This incentive tier proposes \$3.20/watt for PV serving residential units and \$2.20/watt for PV serving common areas. For this category of installations there are no other leveraged funding sources to offset costs, and no use of TPO financing structures. To assess sensitivities regarding program financing we assumed that 100% of the solar PV installations are at this level since this category of funding would place the highest demand on incentives. For energy storage, we assumed an incentive level of \$0.50/Watt Hour, which is consistent with levels in the SGIP program.

⁷⁵ AB 693. Section 1(f).

⁷⁶ The target of installing at least 300 MW of new solar capacity is based on a funding scenario in which the program is allocated the full level of funding authorized under Section 2870(c) over the 10-year period.

⁷⁷ As noted in Section X, the use of AB 693 funding allocations for energy efficiency would only be considered as a last resort if funding from other energy efficiency programs or accounts is not available.

For PV installation costs, we assumed an average cost of \$3.20/watt, which is described in the proposal. For a 270kW system designed to offset 70% of residential electricity use and 100% of common area use in a multifamily property, the estimated cost would be \$764,000.

The energy storage system's capacity and costs is based on an analysis performed by Geli,^{78,79} which is described in detail in Section XI. The design of this system is integrated with the solar PV installation to optimize peak reductions for both residents and common areas. For a storage system designed to optimize electric bill reduction for both residents and common areas, this would add an additional \$180,000 in cost for a 360 kilowatt-hour storage device at an incentive of \$0.50/watt-hour. The analysis done assumes that 100% of the properties installing PV would also incorporate storage devices. Energy storage would be options under the program and this assumption is far in excess of what is expected under the program. It is used here to model a worst case scenario.

The capacity and costs for the solar energy system (Solar PV+Energy Storage) is shown in Table 12. To model out-year costs, we assumed a 7% reduction in solar PV costs and a 5% reduction in storage costs each year.

**Table 12 – AB 693 Budget Analysis
PV Capacity and Cost Estimates**

	Residential units	Common area	Entire Property
PV capacity (kW)	170 ⁸⁰	100	270
PV incentive (\$/W)	\$3.20	\$2.20	\$2.83
Total PV incentive	\$544,000	\$220,000	\$764,000
Storage size (kWh)	270	90	360
Storage incentive (\$/Wh)	\$0.50	\$0.50	\$0.50
Total Storage incentive	\$135,000	\$45,000	\$180,000
Total incentive	\$679,000	\$265,000	\$944,000

⁷⁸ Based on Geli analysis of tenant bill savings under time-of-use rates for 75 unit affordable housing property.

⁷⁹ Based on largest system size found to be economic for affordable housing properties analyzed in Closing the California Clean Energy Divide, available at <http://www.cleangroup.org/ceg-resources/resource/closing-the-california-clean-energy-divide/>

⁸⁰ Solar PV assumptions based on analysis presented in Appendix E: Incentive Structure for PV Installation.

Findings: The results of the analysis are shown in Table 13 over the ten-year life of the program. Key findings include:

- i. First year generating capacity is estimated of 22.9 MW. This estimate is a worst-case scenario since it assumes that 100% of the installations are funded at the highest incentive level proposed for the program and that 100% of the installations include energy storage systems.
- ii. Cumulative deployment of solar PV –including efficiency and storage– over an anticipated ten-year lifetime of the incentive program would be **317 MW**. If the inclusion of energy storage devices is adjusted to 50% of the properties, which is a more realistic expectation, the estimated added generated capacity would be **354 MW**. If more blended funding scenarios are used to reflect the different incentive structures proposed, the case, the estimate could exceed 400MW.
- iii. Inclusion of storage devices could increase annual affordable housing electric bill savings by an **additional \$21 million per year** over the lifetime of the program, amounting to \$317 million in storage-enabled saving over the anticipated life of the systems.

**Table 13 – AB 693 Capacity Generation Analysis
Estimated Outcomes of Integrated Solar Energy Systems**

Year	PV incentive (\$)	Storage incentive (\$)	PV capacity (MW)	Cumulative PV capacity (MW)	Annual storage savings (million\$)	Cumulative storage savings (million\$)
1	764,000	180,000	22.9	22.9	1.5	1.5
2	710,520	171,000	24.5	47.4	1.6	3.1
3	660,784	162,450	26.2	73.6	1.7	4.8
4	614,529	154,328	28.1	101.7	1.9	6.7
5	571,512	146,611	30.1	131.8	2.0	8.7
6	531,506	139,281	32.2	164.0	2.1	10.8
7	494,301	132,317	34.5	198.5	2.3	13.1
8	459,699	125,701	36.9	235.4	2.5	15.6
9	427,521	119,416	39.5	274.9	2.6	18.2
10	397,594	113,445	42.3	317.1	2.8	21.0

Of course, if funding levels are less than anticipated, these numbers would change, but then so presumably would the target. The analysis establishes that there is no factual basis for arguing against the inclusion of energy efficiency and energy storage based on program’s ability to reach AB 693’s MW goal at full funding levels.

IX. Local Hiring Requirements⁸¹

AB 693 requires that the Commission “establish local hiring requirements for the program to provide economic development benefits to disadvantaged communities.”⁸²

Particularly over the last five years, local hiring has been accepted as a key anti-poverty tool across the state. Consequently, there are now a wide range of local hiring policies: “good faith” First Source local hiring policies, San Francisco’s mandatory Local Hiring Policy for Construction, U.S. Department of Transportation’s local hiring pilots, among many others. AB 693 has also sought to similarly guarantee good-paying jobs for residents of disadvantaged communities within the solar industry. The Joint Parties feel strongly that the most effective way to ensure that rooftop solar installations provide economic development benefits to disadvantaged communities is to ensure that those installations translate into good paying, long-lasting jobs for local disadvantaged residents.

The Program’s local hiring policy should include a robust data collection requirement.

The local hiring policy design should include reliable and granular workforce data collection. The collected data will be critical to not only determining the success of AB 693’s local hiring requirements, but also providing insights as to how to improve local hiring policies in future iterations of the program. The Commission should require contractors to provide data to the Program Administrator on:

- The number of work-hours performed by local residents, disadvantaged residents, minority workers, and women workers as well as the total number of worker-hours performed for each project
- Job retention, namely the length of time the contractor keeps local residents employed
- Employee access industry-recognized certifications
- Wages and benefits of all temporary, part-time and full-time employees
- Employee travel distance and/or travel time to the worksite

Collecting this data will require a unified workforce reporting system that collects certified payroll reporting. Reflecting the diversity of the state, this reporting system should have modules capable of tracking different local hiring policies, ranging from “good faith” to

⁸¹ Question 12 ,of the ALJ’s July 8, 2016 Ruling are covered in this section.

⁸² § 2870(f)(6).

mandatory local hiring policies. The system should also be dynamic as well by tracking data in real time and allowing the awarding body to forecast how much workforce is needed. The system's granular measurement of project work-hours will measure the success of job training service providers, help to focus training dollars, and adjust local hiring policies for underutilized and overutilized trades.

The Commission should also require compatibility with other major workforce data collection systems, particularly in housing and energy efficiency. For instance, Section 3 of the HUD Act of 1968 is the legal basis for providing jobs for residents and awarding contracts to businesses in areas receiving certain types of HUD financial assistance. Given the sheer volume of HUD work,⁸³ Section 3 data collection and reporting has become standardized among the many developers, contractors, and subcontractors on HUD-financed projects. The workforce data collection system also provides key policy guidance for housing authorities, redevelopment agencies, and federal Department of Housing and Urban Development (HUD). Similarly, the Commission should seek to compatibility with this pre-existing system.

For this Program, workforce data collection should be implemented with little to no additional administrative burden on contractors. The process and reporting mechanism should leverage existing contractors' internal reporting capabilities and accommodate any template for certified payroll reporting system used in the state. Utilizing a workforce reporting system that has been adopted most major counties in California would also avoid additional burdens or costs to contractors already familiar with the basics of certified payroll reporting. By taking advantage of existing workforce development frameworks and practices, the Commission can thus be sensitive to the needs of contractors by adopting one unified, structurally manageable and scalable workforce reporting system.

⁸³From 2012 to 2015, HUD funding generated 110,500 jobs for new Section 3 employees and trainees as well as \$4.8 billion awarded to Section 3 businesses. U.S. Department of Housing and Urban Development, "Section 3: Connecting Low-Income Residents with Opportunity", June 23, 2016, available at: http://portal.hud.gov/hudportal/documents/huddoc?id=section3_brochure_final.pdf

The Commission should initially establish base floor requirements for local hiring that will evolve into stronger policies.

Reflecting the diversity of the state, local hiring requirements for AB 693 should be both flexible and strong enough to shift the market focus to prioritizing job opportunities for local, low-income and disadvantaged communities. Solar installers receiving Program incentives should proactively work with local Workforce Investment Boards (WIBs) and local job training organizations to recruit new hires from local disadvantaged communities. To ensure the quality of jobs that go to local disadvantaged residents, solar installers should adhere to prevailing wage requirements when such requirements are triggered by leveraged financing sources on Program projects, as San Francisco's successful mandatory local hiring law does. Finally, solar installers receiving Program incentives should collect and make publicly available sufficiently detailed data to inform future local hire policies.

The Program's local hiring policy should primarily focus on job placement rather than job training.

While Joint Parties recognize that job training is an important element of providing economic development benefits to disadvantaged communities, we believe that the Program should focus primarily on job placement. First, the text of AB 693 explicitly calls for the Commission to establish "local hiring requirements." It does not ask the Commission to establish a job training requirement. Second, Joint Parties believe that the state's solar workforce development goals would be best served by having the Program translate the success of previous job training requirements into actual job placement.

Job training requirements in previous state-wide solar incentive programs, such as the Single Family Affordable Solar Homes (SASH) and the Multifamily Affordable Solar Housing (MASH) programs, have been successful in increasing the pool of disadvantaged residents who are qualified to perform residential solar installations. But job training is not sufficient to fully realize the potential community economic development benefits of affordable housing solar

incentives and is meaningless if it is not followed by job placement. Thus, while AB 693 should include a job training component, efforts related to job training should be a much smaller part of the program compared to job placement. Requiring actual job placement for disadvantaged residents is essential to creating long-lasting economic benefits for disadvantaged residents and their communities.

A number of job training service providers and community-based organizations have demonstrated strong commitment to both job training and placement in the solar industry, including organizations such as Grid Alternatives, Rising Sun Energy Center, San Francisco Conservation Corps, Asian Neighborhood Design, among many others. To take advantage of these existing job training programs, the Commission should establish an electronic data source to list all available workforce from local, low-income and disadvantaged communities, thus enabling collaboration between local job training organizations and contractors and ensuring an effective balance between workforce demand and supply.

It is also important to emphasize that low-income and disadvantaged workers may have barriers to accessing training programs due to lack of compensation during training programs. In addition, these workers face other barriers such as adequate transportation, childcare obligations, and other barriers. We therefore recommend that the Commission target training programs that have been able to address one or more of these barriers to training.

For the first three years of solar projects funded by AB 693, the Commission should adopt a broad local hire base requirement coupled with a requirement to comply with prevailing wage requirements on Program projects when such requirements are triggered by leveraged financing sources

For the first three years of implementation, the Commission should require contractors receiving Program incentives to make a good faith effort to hire local residents for its installations. The Commission should also require contractors to comply with state prevailing wage requirements on solar energy systems installed through the Multifamily Solar Roofs Program when such requirements are triggered by leveraged financing sources. A “good faith

effort” to hire local residents means that contractors should proactively reach out to local WIBs and job-training organizations to find qualified local residents to fill open positions.

AB 693 does not explicitly define “local hire.” However, this term “primarily refers to programs that require direct hiring of residents of specific local areas.”⁸⁴ Considering the significant demographic variation throughout the state, “local resident” should be broadly defined as an individual residing in the same county as the project or an individual hired from a job-training organization located in the same county as the project. To ensure that AB 693 local hiring requirements “provide economic development benefits to *disadvantaged communities*,”⁸⁵ the Commission should prioritize hiring from CalEnviroScreen-designated disadvantaged communities and low-income communities as well as the hiring of disadvantaged workers.

The plain language of AB 693 supports prioritizing workers from these communities. Section 2870(f)(6), the local hire provision, clearly requires that “local hiring” requirements “provide economic development benefits *to* disadvantaged communities.”⁸⁶ In other words, disadvantaged communities are the primary intended beneficiaries of the local hiring requirements. This provision is supported by one of the bill’s legislative declarations, which proclaims: “[i]nstalling qualified solar energy systems *in* disadvantaged communities can provide *local* economic development benefits.”⁸⁷ This paragraph demonstrates that the Legislature views solar installations in disadvantaged communities as providing “local” (i.e., in a disadvantaged community) economic benefits, such as job opportunities.

⁸⁴ UCLA Labor Center, Exploring Local Hire: An Assessment of Best Practices in the Construction Industry, p. 13 (March 2014), *available at* <http://www.labor.ucla.edu/publication/exploring-targeted-hire/>.

⁸⁵ Cal. Pub. Util. Code § 2870(f)(6) (emphasis added).

⁸⁶ Cal. Pub. Util. Code § 2870(f)(6).

⁸⁷ AB 693 Section 1(c) (emphasis added).

For projects located in CES DACs, contractors should prioritize hiring residents located in communities designated as disadvantaged by CalEnviroScreen⁸⁸ in the county where the project is sited. If there are not enough qualified workers from CES DACs, workers should then be pulled from low-income communities outside of CES DACs but still within the county where the project is sited. For projects located outside of CES DACs, contractors should prioritize hiring residents of low-income communities within the county where the project is located. If, after first seeking workers from CES DACs and low-income communities there remains an insufficient number of qualified workers, other workers may be selected from across the county. If the contractor cannot fill an open position with a qualified local resident, it should submit to the Program Administrator a written description of the steps it took to find a qualified local resident, reasons that it did not hire a local resident referred to them by a local job-training organization if there was such a referral, and the city and county of residence of the worker it did hire. These recommendations not only align with the language and intent of AB 693, they also target communities that may be the most in need of economic opportunities and ensure that contractors have a broad pool of workers to choose from to avoid project delays.

Additionally, contractors should make a particular effort to hire disadvantaged workers. A disadvantaged worker is someone who faces or has overcome at least one of the following barriers to employment: being homeless; being a custodial single parent; receiving public assistance; lacking a GED or high school diploma; participating in a vocational English as a second language program; or having a criminal record or other involvement with the criminal justice system.⁸⁹ As with the prioritization recommendation above, the program administrator would retain the flexibility to seek other qualified workers when disadvantaged workers are unavailable.

⁸⁸ The cut-off point for CalEnviroScreen-designated disadvantaged communities for the purposes of the local hiring policy should coincide with the adopted cut-off point for the Program as a whole. That is, if the Commission adopts Joint Parties' proposal to define "disadvantaged communities" for the Program as the top 25% of CES-designated disadvantaged communities *either* across the state *or* by IOU territory (whichever captures a greater number of census tracts), the same measure should be used for the local hiring policy.

⁸⁹ This definition borrows from San Francisco's definition of "disadvantaged worker." See San Francisco Administrative Code § 6.22(G)(2)(g).

Finally, to ensure that the Program provides meaningful and substantial economic benefits to disadvantaged communities, the Commission should require contractors to comply with prevailing wage standards for all of their work on AB 693 projects when such requirements are triggered by leveraged financing sources. Prevailing wage standards are intended to ensure that public monies create good paying jobs. Similarly, the Commission should ensure that individuals working for contractors receiving incentives under AB 693 make a sustainable living wage.

At the end of three years, the Commission should also require each of the Program Administrator to issue a summary report detailing their local hiring results. As described above, these results would report out the granular data collected within each IOU territory. These reports should also include breakouts of local hiring by county as well as a survey of the contractors and other workforce development system stakeholders. Assessing three years of this data as a foundation, workforce stakeholders and the Commission will then be able to further evolve local hiring policies and targeting of disadvantaged communities across the state of California.

X. Energy Efficiency Requirements⁹⁰

To meet the legislative requirements of AB 693, and to ensure solar systems are cost-effectively sized for efficient building loads, we recommend the CPUC adopt a 15% energy efficiency requirement for participating buildings, with associated support in services and funding.

The 15% energy efficiency requirement would include:

- A comprehensive audit and implementation plan
- A 3 year flexibility provision to complete identified improvements
- Alternative compliance mechanisms, e.g. proof of recent retrofit or meeting a set Energy Usage Intensity benchmark
- Full technical and programmatic support for owners
- Funding support via existing programs and an additional fund that leverages one or more of the following funding sources:
 - o Unspent AB 693 funding
 - o New funding under PUC Code section 748.5
 - o Energy Savings Assistance Program general or unspent funds
 - o Energy Efficiency portfolio program general or unspent funds

The efficiency component would also contribute towards meeting the state's efficiency doubling requirement under SB 350.

Legislative Requirements

AB 693 requires that:

The commission shall establish energy efficiency requirements that are equal to the energy efficiency requirements established for the program described in Section 2852, including participation in a federal, state, or utility-funded energy efficiency program or documentation of a recent energy efficiency retrofit.⁹¹

The applicable language under PUC Code section 2852 states:

(c)(3) All moneys set aside for the purpose of funding the installation of solar energy systems on low-income residential housing that are unexpended and unencumbered on January 1, 2022, and all moneys thereafter repaid pursuant to paragraph (2), except to the extent those moneys are encumbered pursuant to this section, *shall be utilized to augment existing cost-effective energy efficiency measures in low-income residential housing that benefit ratepayers.*⁹²

⁹⁰ Questions 22 and 10 of the ALJ's July 8, 2016 Ruling are covered in this section.

⁹¹ AB 693 amendments to Public Utilities Code, Section 2870(f)(7).

⁹² PUC, Section 2852(d)(2), emphasis added.

(d) In supervising a program implementing the California Solar Initiative pursuant to this section, the commission shall ensure that the program does all of the following:
(d)(2) Requires participants who receive monetary incentives to enroll in the Energy Savings Assistance Program established pursuant to Section 382, if eligible.⁹³

AB 693 thus requires qualified multifamily properties receiving assistance under the Multifamily Solar Roofs program to undertake energy efficiency improvements as a condition of receiving incentives for the solar energy system. Furthermore, PUC Code section 2852(c)(3) establishes that unencumbered funds can be used to augment cost-effective energy efficiency measures.

Additionally, SB 350, enacted during the same legislative session as AB 693, establishes a requirement “to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation,”⁹⁴ and requires the CPUC to establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings by January 1, 2030.⁹⁵ Under SB 350, the requirements established to double energy efficiency may be achieved through energy efficiency savings and demand reduction resulting from a variety of programs, including “a comprehensive program to achieve greater energy efficiency savings in California’s existing residential and nonresidential building stock pursuant to Section 25943.”⁹⁶ Under Section 25943 of the Public Resource Code, a comprehensive program may include “a broad range of energy assessments, building benchmarking, energy rating, cost-effective energy efficiency improvements, public and private sector energy efficiency financing options, public outreach and education efforts, and green workforce training.”⁹⁷

Thus, the scope and the requirements prescribed for on AB 693 pertaining to energy efficiency, local hiring, outreach and education, as well as the solar investments and financing options, provide a comprehensive platform to advance the achievement of SB 350 mandates in the affordable multifamily housing market.

⁹³ PUC, Section 2852(d)(3)

⁹⁴ SB 350. Section 2(a)(2).

⁹⁵ SB 350. Section 6(c)(1).

⁹⁶ SB 350. Section 6(d)(2).

⁹⁷ Public Resource Code. Section 25943(a)(2).

Energy Efficiency Program Design

We recommend the Commission consider the following factors in designing an effective energy efficiency component for the Multifamily Solar Roofs Program:

- *Energy Efficiency Goals:* The energy efficiency element of the Multifamily Solar Roofs program should require a minimum energy improvement goal. We recommend that the goal be designed to achieve a minimum reduction in net energy use (before solar) of at least 15% per property, as leading whole-building programs currently require.⁹⁸ The design of the energy efficiency portion of this program should be based on this requirement.
- *Incorporation of Efficiency in Solar System Design:* Linking energy efficiency with the installation of solar energy systems can help reduce the cost of the installed system by reducing the associated load. Starting with energy efficiency also ensures compliance with the state's loading order.⁹⁹ Before investing in more expensive solar options, more cost effective improvements that reduce – not offset –energy use should be incorporated into the investment strategy. If it is not possible to make the investment in energy efficiency before the solar installation, then the solar system size should be capped to accommodate a future investment based on the energy efficiency reductions identified by an energy efficiency audit.
- *Affordable Housing Market Specific Solutions:* The Bay Area Regional Energy Network (BayREN) and the Large Multifamily LIWP program have designed and implemented successful energy efficiency programs that are models for the Multifamily Solar Roofs Program. These programs have been able to enroll and scale energy efficiency improvements in multifamily markets described by IOU energy efficiency administrators as “underserved” and “hard to reach.” Core elements of these programs that contribute to their success and acceptance by multifamily property owners include: providing no cost front-end technical support, “One-Stop” program offerings from design to full implementation of energy improvement plans, and property owner selection of installation contractors.

⁹⁸ The 15% energy performance requirement recommended for AB 693 is consistent with the minimum energy reduction requirements set for the multifamily Energy Upgrade California program administered by IOUS and Regional Energy Networks, and the statewide Large Multifamily Low Income Weatherization administered by the California Department of Community Services Development (CSD) and funded from Cap and Trade allocations. Specifically, both BAYREN's whole-building multifamily program and CSD's large multifamily program now require a 15% threshold.

⁹⁹ “As stated in Energy Action Plan I and reiterated here, cost effective energy efficiency is the resource of first choice for meeting California's energy needs. Energy efficiency is the least cost, most reliable, and most environmentally-sensitive resource, and minimizes our contribution to climate change.” CPUC/CEC, Energy Action Plan II, Implementation Roadmap for Energy Policies (October 2005). Available at: <http://docs.cpuc.ca.gov/published/REPORT/51604.htm>; “The electrical corporation shall first meet its unmet resource needs through all available energy efficiency and demand reduction resources that are cost effective, reliable, and feasible.” Cal. Public Util. Code § 454.5(b)(9)(C).

- **Funding Resources:** Within affordable housing markets, energy efficiency improvements for both residential units and common areas requires significant upfront funding support. Affordable multifamily housing is defined by rent affordability and other regulatory restrictions that limit property cash flow and owners' abilities to undertake whole building energy efficiency retrofits outside of project refinancing cycles (which often extend beyond twenty years). Additionally, equipment replacement reserves are limited and generally insufficient to cover the costs of major energy improvements or whole building energy efficiency retrofits. To address property resource constraints in implementing energy efficiency improvements, we recommend that utility customer and Greenhouse Gas Reduction Fund energy efficiency programs, such as the Energy Upgrade California and CSD's LIWP Large Multifamily program, be leveraged to enable whole building energy investments for this sector. As described below, we also strongly urge the Commission to make additional funds available to supplement likely remaining shortfalls. Such an approach is necessary to mitigate funding barriers and to address low-income energy cost burdens.
- **Phased Implementation:** Energy improvements in multifamily properties are often planned around scheduled equipment replacements, vacancies, and recapitalization events. Flexibility should be provided with regards to the scheduling and phasing of energy improvements to mitigate scheduling conflicts or negative impacts on solar energy system installations.
- **One Stop Implementation:** To successfully implement the program, comprehensive technical support must be provided to the property owner to assess energy efficiency opportunities and to develop a corresponding energy efficiency strategy and plan that meets the needs of the property owner and tenants. This support must include (1) an energy audit that provides a detailed analysis of energy usage, costs, and the building systems and conditions affecting energy consumption, and (2) support services to coordinate integrated funding of resident units and common area energy efficiency improvements. The BayREN Multifamily Energy Upgrade program and the Large Multifamily LIWP program have adopted *service delivery plans* to integrate these support services into their program designs. We recommend these service delivery plans be replicated by the Multifamily Solar Roofs Program.¹⁰⁰
- **Presumption of Compliance:** Qualified properties participating in the Multifamily Solar Roofs Program should be presumed to have satisfied the program's energy efficiency requirements if the property has undergone a whole-building energy retrofit within the last three years that was supported through a recognized energy efficiency program.¹⁰¹ We recommend defining a whole-building retrofit as one that can reasonably be expected to have achieved

¹⁰⁰ Information in the service delivery and plans adopted by the multifamily BayREN and Large Multifamily LIWP programs is available at: www.camultifamilyenergyefficiency.org and www.bayareamultifamily.org.

¹⁰¹ These programs include the Multifamily Energy Upgrade California that are administered by IOUs, Regional Energy Networks, or CCA, (IOU, REN, or CCA administered), the large and small multifamily Low Income Weatherization administered by the California Department of Community Resources Development (CSD) LIWP, and energy efficiency improvements funded by the California Tax Credit Allocation Committee (TCAC).

10-15 percent savings, or a building that was newly constructed or substantially rehabilitated within the last three years and met or exceeded Title 24 energy building performance standards. Additionally, for affordable housing organizations with established energy benchmarking programs, the Program Administrator could establish a presumption of compliance through demonstration that the affordable housing property meets prescriptive Energy Use Intensity (EUI) thresholds or Portfolio Manager benchmark scores set by the Program Administrator.

Proposed Energy Efficiency Program Structure, Requirements, and Process

We recommend that the energy efficiency requirements for the Multifamily Solar Roofs Program be implemented through the following steps.

- *Energy Efficiency Program Technical Support Administrator:* The Program Administrator contracts with an Energy Efficiency Program Administrator to facilitate the implementation of resident and common area energy efficiency improvements at the multifamily site. The Energy Efficiency Program Administrator provides technical assistance in evaluating site conditions and opportunities for energy efficiency improvements and facilitates property owner and tenant access to available energy efficiency resources; similar to what occurs under the BayREN and LIWP programs.
- *Energy Audit and Work Scope Development* – After initial project intake, the Energy Efficiency Program Administrator provides or approves an ASHRAE Level 2 or higher energy audit, which includes a billing analysis and comprehensive assessment of site energy savings opportunities. The energy audits are shared with the property owner and provide a baseline for preparing an Energy Improvement Plan. The energy efficiency reductions identified by the audit must also be considered and factored into the design of the solar energy system.
- *Approval of Scope of Work* – The property owner reviews the energy audit and proposed scope of work with the Energy Efficiency Program Administrator and together they approve an Energy Improvement Plan (EIP) that includes some or all of the recommended energy efficiency measures. The approved Energy Improvement Plan must reduce energy use by at least 15%. Approval of the Energy Improvement Plan is a condition of program participation.
- *Energy Benchmarking* – The property owner is required to benchmark their property to assess current energy use and monitor the energy performance of the property to the extent that whole-building energy usage data is made available by utilities pursuant to requirements set by AB 802. AB 802, which requires the benchmarking of energy usage data for multifamily buildings with 5 or more units with greater than 17 accounts and 50,000 square feet.¹⁰² The Energy Efficiency Program Administrator will provide support to assist property owners in implementing energy benchmarking requirements.

¹⁰² AB 802 revises PRC Section 25402.10 to require utilities to provide energy consumption data for covered buildings to the building owners upon request, and requires the Energy Commission to establish a building energy use benchmarking and public disclosure program for certain buildings including multifamily housing.

- *Energy Efficiency Phasing and Scheduling* – The property would have up to 36 months to fully implement the Energy Improvement Plan. During this period, energy improvements will be phased in at the property in conjunction with scheduled equipment replacements, vacancies, and as energy efficiency program funds become available to the property owner.
- *Energy Efficiency Program Access and Integration* – The Energy Efficiency Program Administrator assists the multifamily property owners and tenants in developing a funding plan for planned energy efficiency improvements and accessing energy efficiency resources available under utility customer and Greenhouse Gas Reduction Fund programs.
- *Project Completion and Documentation* – Once the approved measures in the Energy Improvement Plan are installed, the property submits a certification that the energy efficiency plan has been implemented. The energy efficiency technical administrator should undertake random site inspections or other reviews to verify installation.

Funding for Energy Efficiency Requirements

We recommend the Commission ensure that comprehensive funding for energy efficiency improvements is made available under the Multifamily Solar Roofs program via the following funding sources, in order of priority:

- *Existing Energy Efficiency Programs:* We recommend funding for comprehensive energy efficiency improvements primarily be made available from utility customer, Greenhouse Gas Reduction Funded programs, and housing finance programs. These programs include the Energy Upgrade California Multifamily programs that are administered by IOUs, Regional Energy Networks, or CCA, (IOU, REN, or CCA administered), the large and small multifamily Low Income Weatherization Program (LIWP) administered by the California Department of Community Services and Development (CSD), and energy efficiency improvements funded by Low Income Tax Credits awarded by the California Tax Credit Allocation Committee (TCAC). The Commission can greatly enhance access to ratepayer energy efficiency programs by adopting rules requiring greater integration across the ratepayer energy efficiency programs, and by allowing utilities to pool funds from their respective programs for purposes of the AB 693 efficiency requirement. Currently, these resources are siloed and extremely difficult to leverage or combine for eligible energy efficiency projects. Pooling funds would enable owners to do comprehensive retrofits by minimizing numerous and often conflicting participation requirements. Appropriate energy savings credit could be apportioned to the respective program administrators.
- *Unspent AB 693 funding:* Unspent funding from prior year AB 693 allocations should be made available in instances where energy efficiency program resources are not available, or are insufficient. We recommend that the CPUC ensure the Program Administrator has the flexibility to provide funding from the Multifamily Solar Roofs program on a case-by-case basis to implement energy efficiency improvements, subject to the availability of unspent AB

693 resources from previous years. Allocating unspent funds in a given year to cost-effective energy efficiency improvements is in part required by AB 693's implementing legislation, which stipulates the energy efficiency requirement be equal to that in Public Utilities Code section 2852.¹⁰³ Public Utilities Code section 2852(c)(3), in turn, provides that unspent funds shall be allocated to cost-effective energy efficiency improvements.¹⁰⁴

- *New Funding Under PUC Code Section 748.5:* Section 748.5 of the Public Utilities Code provides that: "the commission may allocate up to 15 percent of the revenues, including any accrued interest, received by an electrical corporation as a result of the direct allocation of greenhouse gas allowances to electrical distribution utilities pursuant to subdivision (b) of Section 95890 of Title 17 of the California Code of Regulations, for clean energy and energy efficiency projects...."¹⁰⁵ AB 693 directed the use of 10% of these resources for the Multifamily Solar Roofs Program. Should funding from available energy efficiency programs and AB 693 be insufficient to implement energy efficiency improvements under the Multifamily Solar Roofs Program, we propose that the Commission make available an additional 1-2% for efficiency improvements under the Multifamily Solar Roofs Program, from the direct allocation of greenhouse gas allowances to electrical distribution utilities pursuant to subdivision (b) of Section 95890 of Title 17.
- *Transferring ESA Program Resources:* As an additional or alternative funding source for energy efficiency improvements, we recommend that a portion of the unspent energy efficiency funds in the Energy Savings Assistance Program (ESAP) be reprogrammed for use in the Multifamily Solar Roofs program. Between 2009-2015, utilities accumulated nearly \$400 million in unspent funds, a portion of which could be applied to efficiency projects under the AB 693 program.

Compliance and Documentation

As evidence of compliance with the program's energy efficiency requirements, participating owners should be required to provide the following documents:

- Energy Audit Approved Energy Improvement Plan (*provided or approved by the energy efficiency technical administrator*)
- Certification of Energy Efficiency Project Completion (*provided by property owner*)

¹⁰³ PUC Section 2870(f)

¹⁰⁴ PUC Section 2852(c)(3)

¹⁰⁵ PUC. Section 748.5(c)

XI. Energy Storage¹⁰⁶

AB 693 defines a “solar energy system” as “a solar energy photovoltaic device that meets or exceeds the eligibility criteria established pursuant to Section 25782 of the Public Resources Code.”¹⁰⁷ The Public Resource Code provides added clarification that,

Solar energy system means a solar energy device that has the primary purpose of providing for the collection and distribution of solar energy for the generation of electricity, that produces at least one kW, and not more than five MW, alternating current rated peak electricity, and that meets or exceeds the eligibility criteria established pursuant to Section 25782.”¹⁰⁸

Based on the plain language of the law, its legislative history and interpretations of the term solar energy system by other California and federal agencies, the definition of that term includes storage devices within its coverage. The Nonprofit Solar Stakeholders Coalition recommends that this view of the plain meaning of the statutory term be adopted by the Commission for the following reasons:

- The plain language of “solar energy system” must refer to all **balance-of-system components** of such a solar system. This obviously would include all its component parts, such as inverters and mounting structures and, increasingly, storage devices.¹⁰⁹
- The law defines the term “solar energy system” under Sec. 25781(e) as “providing for the **collection and distribution** of solar energy” —a solar process relying on all balance-of-system components, including storage.
- The law’s only relevant legislative history, the CPUC recognized that the law would be “significantly different from existing renewable energy programs... [and the CPUC] would need to open a new proceeding to design and establish the program rules.” Specifically, the CPUC analysis stated that while the current MASH program provides incentives only to solar-electric systems, “the incentive program proposed by this bill would incentivize “qualifying renewable energy systems.”¹¹⁰

¹⁰⁶ Questions 8 and 9 of the ALJ’s July 8, 2016 Ruling are covered in this section.

¹⁰⁷ AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(a)(4).

¹⁰⁸ Public Resource Code. Section 25781(e)

¹⁰⁹ Under the Self-Generation Incentive Program (SGIP) nearly 500 solar plus storage projects have been supported by public subsidies in California based on the best reading of the projects funded. See SGIP Weekly Statewide Report available at https://www.selfgenca.com/documents/reports/statewide_projects.

¹¹⁰ Curran, Elizabeth and Kochanowsky, Amy, California Public Utilities Commission, “Division Analysis: Multifamily Affordable Housing Renewables Program.” See attached document in Appendix F.

- Other California and federal agencies interpret the plain language statutory term “solar energy system” to unequivocally include storage devices. This is so in the implementation by the California State Board of Equalization for purposes of excluding property taxes on solar installations;¹¹¹ as reaffirmed by the California Clean Energy Authority¹¹² while the U.S. Department of Energy defines “solar energy system” to include optional batteries as part of a typical solar balance-of-system.¹¹³

A legal analysis supporting the eligible of energy storage as a component of an integrated solar energy system that provides for the collection and distribution of solar energy is provide in Appendix G.

Inclusion of Storage Meets Tenant Benefit and Equity Goals of the Law

Overall, the law’s purpose is to ensure that low-income tenants residing in affordable multifamily housing receive the economic benefits of both “clean energy and energy efficiency projects.” This is achieved through the installation of solar energy systems, energy efficiency, and local hiring in a way that helps low-income tenants reduce their electric bills, while also achieving the other environmental and clean energy goals of the state.¹¹⁴

To meet these legislative goals, affordable housing owners and their tenants should have the same options as other utility customers to choose the clean energy technologies that

¹¹¹ California State Board of Equalization - Property and Special Taxes Department, Guidelines for Active Solar Energy Systems New Construction Exclusion. Available at <https://www.boe.ca.gov/proptaxes/pdf/Ita12053.pdf>

¹¹² Clean Energy Authority, “California Solar Rebates and Incentives: California Property Tax Exclusion for Solar Energy Systems.” Available at <http://www.cleanenergyauthority.com/solar-rebates-and-incentives/california/california-property-tax-exclusion/>.

¹¹³ See <http://energy.gov/energysaver/small-solar-electric-systems> and <http://energy.gov/eere/energybasics/articles/solar-photovoltaic-system-design-basics>.

¹¹⁴ According to a recent study, when sited and deployed according to air quality data, energy storage (and other distributed resources) can reduce reliance on polluting peaker power plants and lower emissions in disadvantaged communities. Researchers at UC Berkeley and nonprofit research institute PSE Healthy Energy found that storage can strategically replace more polluting energy services in the areas most susceptible to poor air quality and address decades-old discrepancies in environmental justice, whereby poor neighborhoods have been more likely to sit near the dirtiest power plants. So smart placement of storage under an AB 693 incentive regime could both reduce tenant bills and improve the health of low income tenants. See Krieger, Casey and Shonkoff, “Framework for Siting and Dispatch of Emerging Energy Resources to Realize Environmental and Health Benefits: Case Study in Peaker Power Plant Displacement,” Energy Policy 96 (2016) 302-311

best suit their needs now and in the future— including energy efficiency, solar, and storage. Excluding these low-income constituencies from incorporating storage devices would prevent low-income tenants and property owners in this underserved market from having equal access to the full array of solar and storage technology markets and state incentives that now principally benefit the state’s high-income customers.

Having said that, the Nonprofit Solar Stakeholders Coalition’s position is that AB 693 provides incentives for storage as an optional component of a solar balance-of-system, where appropriate, but storage is not required in all cases. Decisions on whether to incorporate storage with solar should be left to the affordable housing property owners and their constituencies, depending on what makes economic sense to fulfill their housing mission and provide tenant benefits with the incentive support under AB 693.

Additional Statutory Interpretation Arguments on Storage Eligibility

Other key state and federal agencies interpret the term “solar energy system” to include battery storage to meet other environmental and energy laws.

- *SB 1* – A key expectation of Senate Bill 1, as referenced in the California Energy Commission (CEC) “Guidelines for California’s Solar Electric Incentive Programs,” is the expectation of “optimal system performance during periods of peak demand.”¹¹⁵ As net grid electricity demand has decreased during sunny daytime hours, shifting peak demand periods towards early evening hours of low or no solar production is a key legislative challenge. Only storage devices can appropriately address this problem and satisfy the state’s policy goal of optimizing solar for peak demand periods.
- *CPUC/CEC Policy* – The inclusion of energy storage within the definition of “solar energy system” is an express policy position of both the CEC and CPUC. CEC has established a precedent for the consideration of storage as part of a solar energy system within Section III(F) of its “Renewables Portfolio Standard Eligibility Guidebook”.¹¹⁶ Also, the CPUC references these energy storage policies in Decision 14-05-033, “Decision Regarding Net Energy Metering Interconnection Eligibility for **Storage Devices Paired**

¹¹⁵ California Energy Commission, Guidelines for California’s Solar Electric Incentive Programs. Available at <http://www.energy.ca.gov/2012publications/CEC-300-2012-008/CEC-300-2012-008-ED5-CMF.pdf>.

¹¹⁶ California Energy Commission, “Renewables Portfolio Standard Eligibility Commission Guidebook.” Available at <http://www.energy.ca.gov/2015publications/CEC-300-2015-001/CEC-300-2015-001-ED8-CMF.pdf>.

with Net Energy Metering Generation Facilities”.¹¹⁷ (Emphasis added). Thus, the CPUC has defined a statewide goal to include storage within solar energy systems to advance the combined systems for purposes of net metering and RPS compliance goals.

- *Prior CPUC Interpretations* – The CPUC has used this exact legislative interpretation approach before in a similar incentive context question involving the Self-Generation Incentive Program (SGIP) when storage was found to be an enabling technology to other statutorily covered technologies. In 2008, Decision 08-11-044, the CPUC concluded that storage devices, although not explicitly mentioned in the statute at that time, nevertheless would be eligible for SGIP incentives as a “coupled” technology because it enhanced the value of the statutorily covered technologies for purposes of peak demand reduction. This is the same argument that should be adopted here by the PUC to allow for storage incentives “coupled” with solar under AB 693 to advance current peak demand reduction and other legislative goals.¹¹⁸
- *Department of Treasury Interpretations* – The inclusion of storage within the definition of “solar energy system” is perhaps most clearly expressed at the federal level. Existing Treasury regulations treat energy storage devices as qualifying “solar energy property” for the purposes of Section 48 investment tax credit (ITC) eligibility. Treasury Regulation § 1.48-9(d) provides that qualifying “energy property” includes “solar energy property” for the purposes of Section 48. Section 1.48-9(d)(3) states that “[s]olar energy property includes equipment that uses solar energy to generate electricity, and *includes storage devices...and parts related to the functioning of those items.*”¹¹⁹ An interpretation of the term “solar energy system” to exclude storage would conflict not only with these IRS tax rules but also with AB 693 Section 2870(f)(4), which requires leverage of “federal tax credits.” Limiting the law to just solar generation would deprive low-income tenants and affordable housing developers of the 30 percent ITC available to reduce the costs for combined solar and storage systems.

The Solar and Storage Value Proposition: How Integrated Systems Create Greater Tenant Economic Benefits Than Alone Solar

The inclusion of storage devices in AB 693 implementation enables additional value creation through utility bill savings for low-income tenants that is greater than would be

¹¹⁷ California Public Utility Commission, Decision 14-05-033, “Decision Regarding Net Energy Metering Interconnection Eligibility for Storage Devices Paired with Net Energy Metering Generation Facilities.” Available at <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M091/K251/91251428.PDF>.

¹¹⁸ California Public Utility Commission, Decision 08-11-44, “Decision Addressing Eligible Technologies Under the Self-Generation Incentive Program (SGIP) and Modifying the Process for Evaluating SGIP Program Change Requests.” Available at http://docs.cpuc.ca.gov/published/FINAL_DECISION/94272.htm.

¹¹⁹ Internal Revenue Service, Treasury, § 1.48–9 Definition of energy property. Available at <https://www.gpo.gov/fdsys/pkg/CFR-2011-title26-vol1/pdf/CFR-2011-title26-vol1-sec1-48-9.pdf>

available with solar-only installations. Specifically, energy storage devices paired with solar can deliver additional bill savings for tenants (and property owners) over stand-alone solar through two avenues:

- 1) Reduction of demand charges for common area loads where those economic benefits can be shared by owners with tenants.
- 2) Shifting tenant solar energy use under time-of-use rates with storage, directly resulting in lower electric bills for tenants.

Both of these value propositions added by energy storage meet AB 693 goals to deliver the most economic benefits of solar energy systems to low-income tenants—in ways that solar-only systems without storage cannot provide now or in the future.

Reduction of Demand Charges

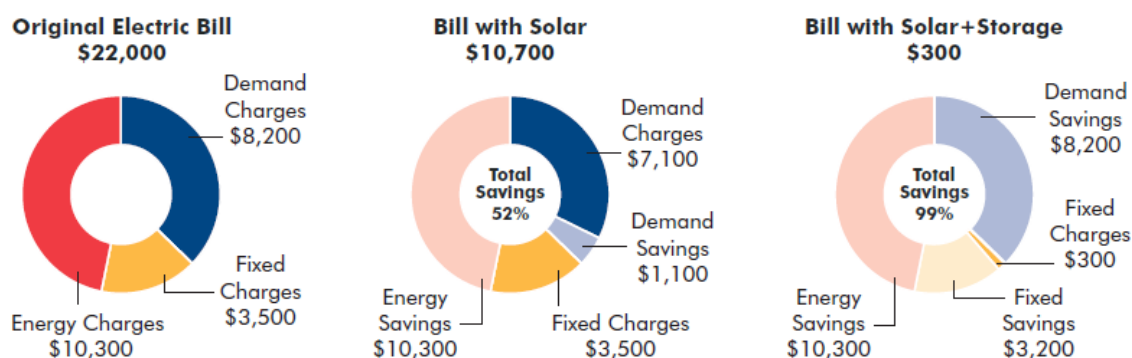
The reduction of demand charge expenses for common area loads provides property owners with the ability to dramatically reduce their overall electric bills, providing them with greater incentive to install solar energy systems¹²⁰ and new opportunities to share those savings with low-income tenants. Quantitative economic evidence of these savings is presented in the report *“Closing the California Clean Energy Divide: Reducing Electric Bills in Affordable Multifamily Rental Housing with Solar+Storage.”*¹²¹

The report finds that it makes economic sense today for many affordable rental housing properties in California to include storage in solar installations. In fact, storage was found to improve the economic return of a solar energy system across all of California’s investor-owned utility jurisdictions. In some cases, adding storage could virtually eliminate common area electric bills, nearly doubling the bill savings of stand-alone solar at about a third of the installed

¹²⁰ It goes without saying but deserves repeating that no benefits for low-income tenants will be derived under AB 693 unless affordable housing owners have the correct incentives to install solar energy systems that can generate those tenant savings. AB 693 is an incentive program, not a mandate. Unless housing developers can see some savings from these systems and otherwise find ways to finance these systems, there will be no projects and thus no opportunities to share economic benefits with their tenants.

¹²¹ California Housing Partnership, Center for Sustainable Energy, Clean Energy Group, and Geli, “Closing the California Clean Energy Divide: Reducing Electric Bills in Affordable Multifamily Rental Housing with Solar+Storage.” Available at <http://www.cleangroup.org/ceg-resources/resource/closing-the-california-clean-energy-divide/>.

cost. As shown in the figure below, a typical affordable housing property in Southern California could increase annual common area savings from \$11,400 with solar-alone to \$21,700 with solar and storage, resulting in an annual electricity bill of about \$300.¹²²



Source: Clean Energy Group

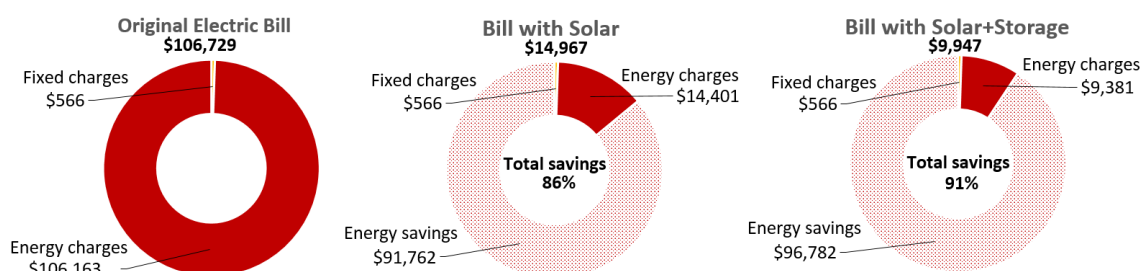
To meet AB 693 goals, there are a number of ways to ensure tenants directly share in these common area savings. For some properties, more of the solar portion of the integrated solar energy system can be allocated to directly offset tenant electricity consumption than would be feasible without storage, which is particularly important for multi-story buildings and those located in dense urban areas. Other properties may choose to adopt a shared savings model, under which tenants are directly allocated a portion of the common area demand charge savings. These and other measures can be developed with input from affordable housing property owner representatives and organizations representing the interests of low-income tenants. In any case, once established, this program should establish clear metrics that would lead to the adoption of administrative approaches to ensure primary tenant benefits through these mechanisms.

¹²² Of course, not all affordable housing properties will have the load characteristics to achieve these savings. That is the point of making storage an eligible, but not mandatory, component under AB 693. These are complex questions that property owners should be responsible to explore based on their utility bills and property needs. Any incentive scheme should let them develop the best combination of technology solutions—including energy efficiency, solar and storage—creating the best business case using available AB 693 incentives and other available sources of funding, including federal tax credits for solar and storage systems.

Shifting Tenant Solar Energy Under Time-of-Use Rates.

The second avenue for tenant bill reduction after sharing demand charge savings through solar and storage is taking advantage of ways to reduce time-of-use (TOU) rate impacts. Under various state energy policy changes, TOU rates will soon be applied to all California residential utility customers. Solar customers are already being transitioned to TOU rates, and default TOU rates will be introduced for all residential customers in 2019, including CARE customers. As a result, low-income tenants living in affordable rental housing will have the opportunity to directly benefit from the incorporation of storage devices through the ability to shift the consumption or export of solar energy from periods of low electricity pricing to periods of high electricity pricing.

New information from the above-referenced report shows that solar time-shifting through adding storage can result in lower tenant electricity bills and maximize the value of solar system investments. That is, this time-shifting and TOU related bill reduction results only if storage is added to the solar installation. These results are for an illustrative affordable housing property with 75 units, and assumes tenants are on a current Southern California Edison (SCE) residential TOU rate tariff. Adding storage increases annual tenant solar bill savings by more than \$5,000 per year. These additional savings represent a direct benefit to tenants that would not be available without the inclusion of storage devices.



Source: Geli/Clean Energy Group

Adding storage to solar results in two additional ways to deliver bill savings under current electric rate tariffs and reduce tenant energy expenses under AB 693 on top of savings from a solar-only system. First, based on the new analysis, tenants could share in over \$10,000 in additional utility bill savings from reducing demand charges on common area loads. Second,

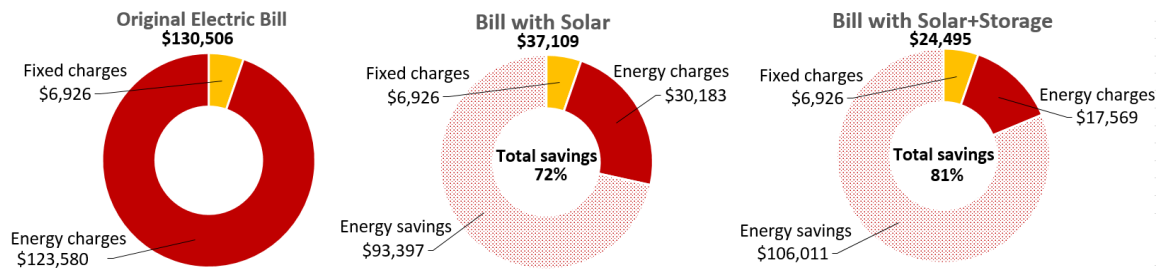
tenants could benefit directly from the additional \$5,000 or more in savings annually from adding storage to a stand-alone solar system. Thus, adding storage to an illustrative building under current tariffs can result in more than \$15,000 per year in additional savings available to share with tenants under the law. Over the likely lifetime of such projects, such additional savings could total over \$200,000 in electric bill savings that would be available to share with tenants for this single representative project alone – but only if storage is added to solar systems.

Future Economic Opportunities for Solar and Storage

Additional opportunities for bill reduction through combined solar and storage will become increasingly important as new policies come into place in California. Distributed energy resource market opportunities, NEM policies, and utility rate tariffs will all evolve over the lifetime of the implemented multiyear program.

To protect tenants from changes that could negatively impact the value proposition of solar and include them in California's energy transition, AB 693 should be geared to leave every pathway open to providing value to low-income customers.

To assess that future scenario and how storage could mitigate against harm to low-income tenants, it is important to look at the economic analysis of potential tenant electric bill savings enabled by storage under expected future solar policy scenarios. The analysis below is based on piloted future TOU rates proposed by SCE, where peak periods have shifted to later in the day when solar PV is not generating electricity. Adding storage increases annual tenant bill savings by nearly 10 percent, resulting in an additional \$12,600 in direct tenant savings per year.



Source: Geli/Clean Energy Group

Adding this to the \$10,400 in savings achieved through demand charge reduction, an affordable rental housing property with 75 units in southern California would realize an additional \$23,000 in annual savings, representing over \$300 in savings per unit each year that would not be available without storage. Under this predicted future scenario, storage would add over \$300,000 in electric bill savings to a solar installation over the projected lifetime of the project.

These economic justifications do not imply that energy storage is right for all multifamily affordable housing properties. In cases where similar utility tariffs and other conditions apply, combining storage with solar results in more economic savings available to affordable housing properties under AB 693 than simply providing incentives to stand-alone solar.

As with solar-only systems, solar energy systems incorporating storage should be implemented in a way that ensures the system primarily benefits affordable housing tenants. Accordingly, the decision on whether to incorporate storage with solar should be left to the affordable housing property owners and their constituencies, depending on what makes economic sense to fulfill their housing mission and provide tenant benefits with the incentive support under AB 693.

Energy Storage Incentives

Storage devices, while an integral part of many solar energy systems, are a very different type of technology than solar, with unique capabilities and separate cost trajectories. Due to these differences, a separate incentive structure should be adopted for the storage portion of a solar energy system. However, inclusion of a storage device in a solar energy

system should not alter the proposed incentive structure for the solar portion of the project. We recommend that the following incentive structure for solar energy systems that include storage devices:

- *Solar Incentive.* Incentives for solar PV panels and balance-of-system components, excluding storage devices, should remain at the proposed incentive level for a solar energy system regardless of the inclusion of storage. Instead, we recommend offering a separate incentive for storage (see below).
- *Storage Incentive with Modified Stepdown.* There should be a separate incentive structure defined specifically to apply to the storage portion of a solar energy system. A good basis for setting the initial incentive level for storage devices can be found in the recent CPUC proposed decision revising the SGIP.¹²³ The decision proposes the adoption of incentives for advanced energy storage technologies at an initial level of \$0.50 per watt-hour for storage systems greater than 10 kilowatts and \$0.60 per watt-hour for systems of 10 kilowatts or smaller, with a four subsequent steps reducing the incentive by \$0.05 per watt-hour at each step. Setting the same storage incentive structure for storage devices under AB 693 should catalyze investment in storage technologies without overly subsidizing the technology.

While it makes sense to base the storage device incentive on the structure defined in the SGIP decision, the step down in incentive levels should not necessarily follow the same timeline. Like solar, storage development for the affordable housing sector, which is more complex market due to complicated financing structures and split incentives, requires a slower decline in incentive levels than for the larger California market. The storage incentive level should be periodically reviewed by the program administrator and adjusted as necessary.

- *Cap for Solar Energy System Incentive.* The total solar energy system incentive available under AB 693, inclusive of both solar and storage incentives, for any project should not exceed 100 percent of the installed system cost, adjusted for other sources of funding, for portions of the system providing economic benefits to tenants and should not exceed 70 percent of the installed system cost, adjusted for other sources of funding, for portions of the system providing economic benefits to common areas.

¹²³ California Public Utilities Commission, “Decision Revising the Self-Generation Incentive Program Pursuant to Senate Bill 861, Assembly Bill 1478, and Implementing Other Changes.” Available at <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M162/K005/162005693.PDF>.

Additionally, boundaries should be set on system sizing to ensure the incentive structure promotes deployment of storage systems designed to optimize economic return for both common area and tenant loads. Each storage system would have two sizing constraints: *Power (kilowatts)* and *Duration (hours)*.

- *Power.* For common area loads, the primary economic opportunity for storage is currently through peak demand reduction. Because of this, the portion of a storage device sized to target common area loads should be limited to a rated power of no greater than a property's anticipated peak demand.

For tenants, the primary economic opportunity for storage is currently through energy time-shifting, also known as energy arbitrage. Due to the goal of AB 693 to deliver tenant benefits through deployment of solar energy systems, storage devices designed for tenant energy time-shifting should be limited in rated power to the rated power output of solar system deployed for direct tenant benefits. In this way, the storage device will be sized appropriately to shift solar generated energy as well as have an opportunity to take advantage of available federal investment tax credits for solar energy system components.

A storage device designed for both common area and tenant benefits should have a total power rating of no more than the combined total of anticipated peak common area load and rated power output of solar designated to directly benefit tenants.

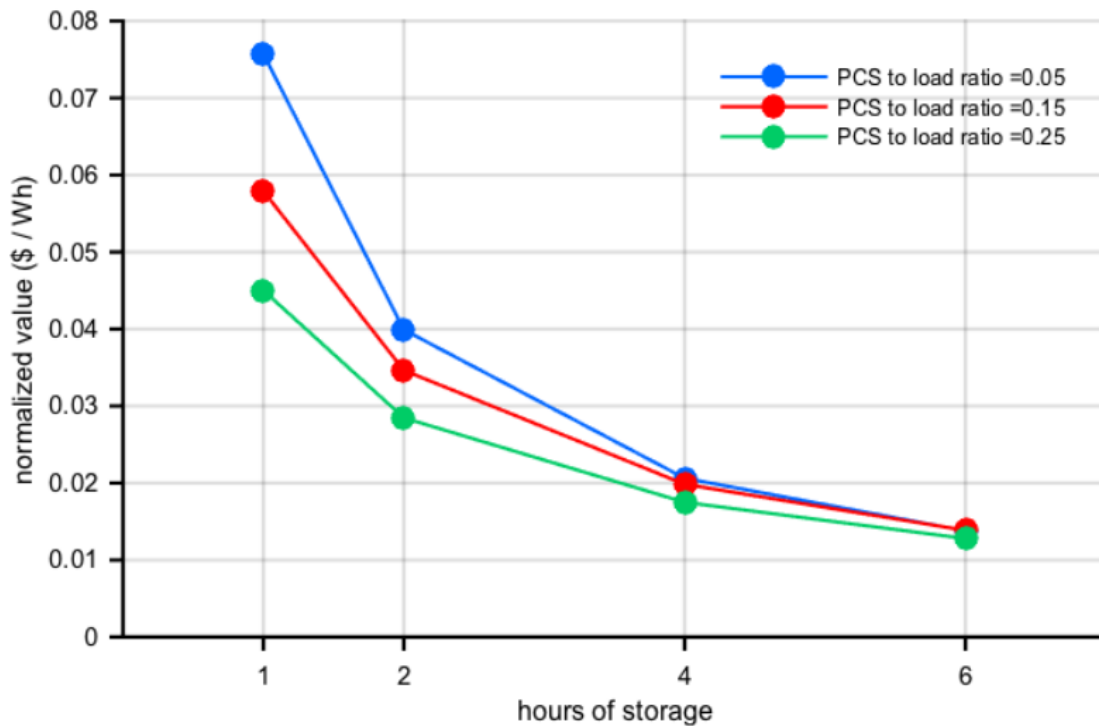
- *Duration.* Based on an analysis of nine California affordable housing properties, optimal duration for common area peak demand reduction in affordable housing ranged from 1.5 hours to 3 hours, with an average duration of 2.6 hours.¹²⁴

This is consistent with analysis by Geli that was included in comments submitted by the solar industry group CALSEIA regarding the May 16th, 2016 CPUC proposed decision to revise SGIP.¹²⁵ The figure below, which was included in CALSEIA's comments to the CPUC, illustrates that the value of demand charge mitigation begins to drop off at the 2-hour duration point and significantly declines after 4 hours.

¹²⁴ California Housing Partnership, Center for Sustainable Energy, Clean Energy Group, and Geli, "Closing the California Clean Energy Divide: Reducing Electric Bills in Affordable Multifamily Rental Housing with Solar+Storage." Available at <http://www.cleangroup.org/ceg-resources/resource/closing-the-california-clean-energy-divide/>.

¹²⁵ California Solar Energy Industries Association, Comments of the California Solar Energy Industries Association on the Proposed Decision on Reforms to the Self-Generation Incentive Program. Available at <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M163/K152/163152824.PDF>

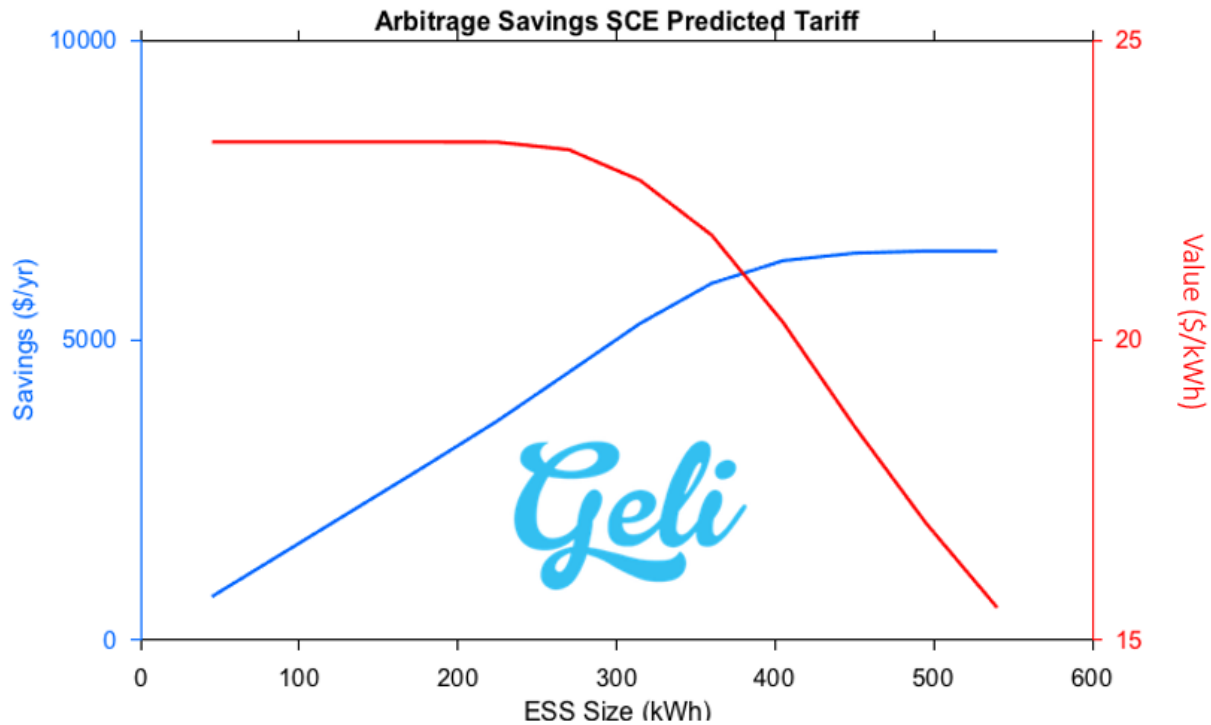
Figure 1. Geli Analysis of Customer Value for Demand Charge Mitigation



Source: California Solar Energy Industries Association, Geli

An analysis by Geli of the value proposition for storage devices performing residential energy time-shifting came to a similar conclusion. The figure below shows the energy arbitrage value proposition of a 120 kW storage device shifting solar energy to impact affordable housing tenant loads under a predicted future Southern California Edison TOU rate tariff. At about 300 kWh, or a storage duration of 2.5 hours, the value in dollars per kilowatt hour begins to decline more rapidly and savings begin to level off. A similar inflection point was found for tenants under PG&E and SDG&E TOU rate tariffs.

**Figure 2. Geli Analysis of Energy Storage Savings (ESS)
Size vs. Savings**



Source: Geli, Clean Energy Group

Based on these results, it is recommended that storage device duration incentivized under implementation of AB 693 be limited to no more than 3 hours. So that, for example, a storage device with a power rating of 100 kW be limited to a capacity of no more than 300 kWh. These power and duration constraints should allow for optimal system design, while discouraging uneconomic oversizing of storage devices.

XII. Program Administrative Structure¹²⁶

AB 693 requires the Commission to put in place an appropriate administrative structure to implement the Multifamily Solar Roofs Program. To determine what administrative structure is most appropriate, AB 693 directs that:

The commission shall consider the most appropriate program administration structure, including administration by a qualified third-party administrator, selected by the commission through a competitive bidding process, or administration by an electrical corporation, in an existing or future proceeding.¹²⁷

The decision on whether to select a third-party administrator or administration by an electrical corporation should take into consideration a number of factors, including those described below.

Alignment of Mission

The administrative structure must be compatible with, and capable of directing, a market transformation through the delivery of a comprehensive menu of energy services and investments that are provided in a manner both responsive and sensitive to the energy needs of property owners and low-income renters. To accomplish this, there must be a seamless alignment between the mission of the Program Administrator and the mission of the organizations owning and operating the affordable housing, the organizations representing the interests of the low-income tenants residing at these properties, and other stakeholders of the program.

Capacity to Provide Administrative Support to Meet All Requirements

As discussed in Section 2 of this Joint Proposal, the Program Administrator will be required to carry out a number of technical and support functions that were not conducted under MASH and that are unique to the Multifamily Solar Roofs Program. These include:

¹²⁶ Questions 10,17,24 and 25 of the ALJ's July 8, 2016 Ruling are covered in this section.

¹²⁷ Cal. Pub. Util. Code § 2870(d).

- i. Ensure that the program incentives are aligned with program costs and account for leveraged resources so that “no individual installation receives incentives at a rate greater than 100 percent of the total system installation costs.”¹²⁸
- ii. Ensure compliance with geographic diversity requirements.¹²⁹
- iii. Provide outreach and technical assistance in disadvantaged and underserved communities to address barriers to accessing renewable energy.
- iv. Ensure compliance with requirements that PV generation is primarily allocated to tenants and that utility tariffs provide a direct economic benefit to tenants.¹³⁰
- v. Monitor and ensure compliance with local hiring.¹³¹
- vi. Provide technical support and facilitate “one-stop” access to utility energy efficiency program resources to implement energy efficiency requirements.¹³²
- vii. Develop protocols and verify compliance with system performance and operation and maintenance requirements.¹³³
- viii. Conduct analysis and market demand assessments.¹³⁴

The previous IOU administrative model developed for programs such as MASH is not sufficient to meet the demands and challenges of a program as complex as AB 693 and the needs of a housing market that to date has been largely underserved by ratepayer energy programs. In particular the MASH IOU model would be structurally unable to ensure compliance with geographic diversity requirements and it would lack the efficiencies and capacity to perform most of the other key tasks listed above.

Administrative Efficiency, Consistency, and Flexibility

Requiring multiple administrative staffs, and replicating administrative processes, marketing plans, local hiring plans, and compliance protocols multiple times, for each electrical corporation, would unduly add to administrative cost. Since many of administrative support functions are fixed cost, a structure with multiple administrators will present difficulties and constraints within the budget limits set for the program. Such budget constraints could

¹²⁸ AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(f)(4) and (5).

¹²⁹ AB 693. Section 1(e).

¹³⁰ AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(f)(2) and (g)(2)

¹³¹ AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(f)(6)

¹³² AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(f)(7).

¹³³ AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(f)(3).

¹³⁴ AB 693 amendments to PUC. Part 2 of Division 1 of the PUC, Section 2870(j)(1) and (2).

adversely affect the delivery of support or technical services to program stakeholders to address barriers and build capacity to implement energy efficiency improvement and install solar energy systems.

Multiple administrators, each with their own staffs and administrative processes, would add complexity and administrative burdens for property owners, who would have to access the program at multiple points, navigate slightly different implementation protocols and practices, and respond to requests to multiple administrators to implement their projects. Focus groups of property owners conducted by Coalition members have shown conclusively that these inefficiencies and burdens would have a chilling effect on participation rates by these property owners and doom the Program to failure. Multiple program administrators would also contribute to differences in the level and quality of services provided to support the program. Uneven outreach or technical support might also result, and adversely affect program participation and compliance with geographic diversity requirements or delay implementation. Property owners require certainty, consistency, and simplicity in the administration of programs, especially one as complex as the Multifamily Solar Roof Program, to secure their participation.

In summary, the scope and complexity of AB 693 requires a single point of entry and the coordinated delivery of administrative support and technical services instead of replicating administrative processes multiple times.

Need for Single, Statewide Administrator

The Nonprofit Solar Stakeholders Coalition recommends and proposes that a third-party statewide Program Administrator be selected to administer the Multifamily Solar Roofs Program. There are several key benefits to this administrative structure that would result in a more successful program and provide the maximum benefits to low-income tenants than traditional IOU administrative structures.

First, IOUs have not achieved desired levels of penetration for other low-income programs such as the CARE and Energy Savings Assistance Programs (ESAP).¹³⁵ In this regard, considerable efforts have been made to expand energy efficiency services for multifamily affordable housing properties under the ESAP. These efforts have been largely thwarted in the Commission's proceeding, contributing to lower program participation by renters and multifamily property owners.

As evidence, the Coalition points to the general energy efficiency proceeding, where the problem statements provided by PG&E, SDG&E, and SCE for their business plans have largely concluded that multifamily properties are "hard to reach" and are "limited in their efficiency improvement opportunities" because of "split incentive" issues and that "only a subset have high potential for energy efficiency savings." IOU Program Administrators have also suggested that multifamily energy efficiency programs have low participation because of low rates of return. SCE observed that "energy efficiency is a relatively low priority for multifamily property owners, like all businesses, they have many demands on their resources."

These generalizations are not applicable to all segments of the multifamily market. Some segments of the multifamily market have been engaged in energy efficiency strategies and segments of affordable housing markets include planning and housing quality requirements that target energy efficiency improvements, subject to the availability of funding. Such misunderstandings about multifamily housing markets ultimately undermined the effectiveness of ratepayer programs with respect to this market segment.

In contrast, the LIWP Large Multifamily program, funded by Cap and Trade allocations, offers a model of a successful statewide, third-party administered program that, unlike IOU programs, provides a one-stop delivery mechanism integrating support and technical services and energy funding resources to facilitate combined energy efficiency and solar improvements. This program, launched in 2016, has been successful in recruiting multifamily property owners in undertaking comprehensive energy improvements and has even come to the aid of MASH projects that have been stalled because of an inability to cover costs for residential installation.

¹³⁵ See CPUC, Low-income Oversight Board, Draft Meeting Minutes, pp. 7-8 (Feb. 23, 2016), *available at* <http://www.liob.org/meetings.aspx>.

The LIWP Large Multifamily demonstrates how statewide third-party managed and administered programs can introduce new service concepts and comprehensive solutions for serving multifamily markets, not possible within traditional IOU business models.

Transferable Administrative Requirements and Processes

A number of core administrative processes requirements must be developed to implement the program. For example, there are some features of the MASH program that are readily transferable and useful to the implementation of AB 693. These include state licensing requirements for solar contractors, PV equipment eligibility, warranty and system performance requirements, and inspection requirements.

Non-Transferable Administrative Requirements

There are also a number of requirements from the MASH program that are not transferable and should be substantially revised under the Multifamily Solar Roofs Program. These include:

- *Application and Reservation Process:* The MASH application and reservation has contributed to several undesirable outcomes. Program reservations have been monopolized by a relatively small group of solar contractors. These practices are evident by the short time period in which IOUs opened up their wait lists to accept new applications. When wait lists were opened, these solar providers made mass reservations, in some cases enrolling multiple properties within a housing organization's portfolio. The current administration of this process also permitted properties on a wait list to be substituted with other properties owned by the same housing organization if it was decided that the proposed solar project was not viable. This loophole encouraged solar providers to over-enroll and over size properties at the front end until project interest or viability was actually determined. The result of these practices was the exclusion of other multifamily property owners from applying for and participating in the program.

To address this problem, the Coalition recommends the following corrective actions are necessary:

- i. Discontinue the practice of allowing solar companies to enroll multiple properties for a property owner at one time.
- ii. Require that multifamily property owners make direct project applications.

- iii. Establish a process to phase application approvals on a quarterly basis
- iv. Set a limit on project reservations that a housing applicant can receive during a quarter
- v. Provide property owners with conditional (60day) reservations to permit housing organizations to obtain competitive bids from multiple solar contractors before locking in reservations
- *Reservation Period:* For projects with LIHTC funding, the reservation period must be extended to 36 months, consistent with the requirements in the New Solar Home Partnership program, to fit with the project development cycle for these projects.
- *Energy Efficiency:* The MASH energy efficiency requirements should not be adopted for the Multifamily Solar Roofs Program. The energy efficiency requirements proposed in Section X should be adopted.
- *Incentive Limitations:* AB 693 specifies additional incentive limitation requirements that must be addressed.
- *Payment Designation:* Payment under AB 693 should be made directly to the property owner, not the solar installer, to ensure project accountability.

New Requirements and Processes

There are a number of new areas that should be addressed in the administrative guidelines for the Multifamily Solar Roofs Program, including:

- *Consumer Protections:* Additional consumer protection are necessary to ensure that property owners and tenants have accurate and reliable information concerning the solar system, system costs, energy savings benefits, operations and maintenance cost, and assumptions used to project out-year energy savings and costs.
- *Operation and Maintenance:* Guidance is needed to address system monitoring and O&M requirements for TPO installed systems.
- *Performance Guarantees:* Guidance is needed to address system performance/production guarantee requirements for TPO installed systems.
- *Energy Storage:* Guidance is needed on energy storage equipment standards and protocols.

Data and Reporting

Greater transparency should be provided for the Multifamily Solar Roofs Program than was provided for the MASH program. For the public to review the performance and outcomes of the program, a greater level of information on the participating properties and installed solar energy systems is needed.

- *Project Data Elements:* Data elements available to the public should include:
 - i. Property name and address
 - ii. Number of residential units
 - iii. Property Type (LIHTC, HUD-assisted, PHA, USDA-RD)

- iv. Property electricity use (aggregated pre-solar baseline)
 - v. Solar energy system ownership (Property, TPO)
 - vi. Solar energy system incentives (residents, common area)
 - vii. Solar energy system details (PV/storage size, costs, panels, inverters, contractor)
 - viii. Solar energy system allocation (residents, common area)
 - ix. Solar energy system financial projections (estimated energy savings for residents, common area)
 - x. Date installed
 - xi. Energy efficiency reduction estimate/goal for property
- *Geographic Data Elements (by Census Tract)*
 - i. *Solar systems installed, under reservations, pending applications*
 - ii. *Solar capacity installed, under reservations, pending applications*
 - iii. *Low-income renters receiving solar benefits*
 - iv. *CARE eligible customers reached by program*
 - v. *PV generation allocated to offset tenant usage*
 - vi. *Number of local hires from solar projects.*
 - vii. *GHG emission reductions.*
 - *Data Disclosure and Transparency:* The Commission should revise policies concerning the disclosure of program information on multifamily properties receiving incentives under the Multifamily Solar Roofs Program.

Under the MASH program, information about project applications, property names and addresses were not made available in the California Solar Initiative public database. Additionally, staff has denied request for this information from nonprofit, public advocacy organizations. The lack of transparency has hampered efforts by organizations to evaluate the programs use by housing organizations, tenant coverage of installed systems, and the amount of MASH installations within DAC and other underserved communities.

Moreover, there is no apparent policy rational that would prevent the release of this information. Affordable multifamily rental properties receiving housing financial assistance and subject to deed restrictions and regulatory agreements, such as those properties funded by MASH, are already included in public databases. These databases include information on property name, address, and type of public assistance received by the property.

We recommend that the same level of transparency be provided for the Multifamily Solar Program.

Safety Issue

The ALJ has requested comments on what safety issues should be considered in the implementation of the program, and who should be responsible for meeting any safety requirements. The central safety issues affecting program implementation concern the installation of the solar energy systems and the ongoing operation and maintenance of the installed equipment.

With regards to installation, matters of site and worker safety should be the responsibility of the solar contractor. Moreover, the installed system should be free from defect that would pose safety risks to the tenants or property owners. These responsibilities are, and should be, delineated in written agreements between the solar company and the property owner. Furthermore, the solar contractor should provide employees with appropriate worker safety training and have appropriate liability and workers compensation insurance in the event of an accident.

With regards to the ongoing operations of the solar systems, the operation of the equipment is generally the responsibility of the owner of the solar energy system. Accordingly, if the solar energy system is owned by a third-party owner, the responsibility for ensuring that the system's operations is safe and poses no risk to the tenants lies with the third party owner. In this regard, the third-party owner should be expected to have appropriate liability and property insurance.

XIII. Conclusion.

AB 693 presents an unprecedented opportunity for California to deliver a comprehensive and integrated energy strategy that materially advances California's energy policies and goals across a market segment that is often underserved by existing energy programs. Through the structure and elements presented in the Joint Proposal, the CPUC can realize the twin goals the Legislature clearly communicated in passing AB 693: to help low-income households residing in affordable multifamily housing realize savings on their electric bills, savings that could mean not having to choose between heat and food on the table, while also furthering the state's greenhouse gas reduction goals.

The Joint Proposal accomplishes the twin goals of AB 693 by developing incentive structures that directly benefit low-income tenants while adequately incentivizing building owners to participate, creating effective energy efficiency requirements, and reducing peak demand with solar plus storage. The Joint Proposal also provides a framework for achieving more robust job placement requirements to achieve long-term and good paying jobs for residents of low-income and disadvantaged communities and targets disadvantaged workers and communities most in need of economic development opportunities. The program design also creates a more equitable solution for project distribution by eliminating the first-come, first-serve approach under MASH and proposes criteria for achieving equitable investments in low-income and disadvantaged communities. Most importantly, the Joint Proposal recommends that the Commission engage a single third-party statewide program administrator to achieve greater efficiency, consistency, and more targeted outreach to the complicated and significantly underserved affordable housing market segment.

In developing the Joint Proposal, the members of the Nonprofit Solar Stakeholder Coalition and our constituents have been strongly influenced by a desire not to replicate past failures or ignore opportunities to leverage successes. We have, in the end, sought to articulate

a framework capable of addressing the long-term energy needs of our state's most vulnerable households and communities consistent with the mandates of AB 693.

The Joint Parties urge the Commission to adopt the program design presented in the Joint Proposal to ensure that low-income renters and the communities they reside in have access to a full range of solutions that their energy future depends on.

Respectfully submitted this 3rd day of August 2016, San Francisco California.

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Jim Grow, Attorney for National Housing Law
Project

Rulemaking 14-07-002

**PROPOSAL FOR THE IMPLEMENTATION OF AB 693
APPENDICES**

*Nonprofit Solar Coalition
Joint Submission*

August 3, 2016

APPENDICES

- A. AB 693 Briefing Materials**
- B. List of Eligible LIHTC Properties**
- C. List of HUD-Assisted Properties**
- D. Solar PV Costs Estimates**
- E. AB 693 Incentive Structure – Backup Analysis**
- F. CPUC Analysis of AB 693**
- G. Energy Storage Legal Analysis**

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**Nonprofit Solar Coalition
Joint Submission**

August 3, 2016

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AB 693 - Multifamily Affordable Housing Solar Roofs Program



AB 693 Frequently Asked Questions - Comparison to MASH

August 2015

AB 693- FAQ

Question: Why is this program needed if MASH already exists?

The Multifamily Affordable Solar Housing (MASH) program has not been successful at scaling solar installations to reach low-income residential units. The following outlines deficiencies in the current approach for serving low-income households in multi-tenant buildings.

Program Goals – The MASH program is designed to meet specific mandated PV production MW targets and other goals in the enabling legislation.¹ There is not an explicit goal in the MASH program that solar installations primarily serve or benefit low-income households. This omission has fostered a Green Divide in California’s solar programs serving multifamily markets.

Budget Limitations to Reaching Disadvantaged Communities – The budget for the MASH programs poses other substantive barriers. The new MASH funding provided by AB 217, \$54 million, is insufficient to pursue long-term strategies to rectify the programmatic gaps and improve access to low-income renters and disadvantaged communities. The current Wait List for MASH projects exceeds available funding. MW Production goals have pushed down incentives levels making it more difficult to reach low-income tenants without additional resources.

Project Economics – The economics of solar installations influence the type and scale of installations possible under the MASH program. To meet production targets for low-income solar programs, the MASH program has required significant leveraging to support PV installations. Unlike the Single Family Affordable Housing Homes (SASH) program, which subsidizes most if not all of the costs on solar installations serving low-income households, under MASH 50% or more of the of the costs of solar installations must be provided from outside sources.² The ensuing funding gaps of the MASH financing structure make it difficult for housing providers or private markets to develop solutions to scale systems beyond property common areas.

¹ Senate Bill 1 authorized the CPUC to create the California Solar Initiative (CSI) in 2006. The CSI Program expanded state support for solar technology and is the product of the “Million Solar Roofs” vision for the State of California. AB 2723 (Pavley) required the PUC to ensure that not less than 10% of the CSI funds are used for the installation of solar energy systems on low-income residential housing. In October 2008, the California Public Utilities Commission (CPUC) issued Decision 08-10-036 establishing a \$108 million solar incentive program for the MASH program. The MASH Program was intended to provide higher incentives to offset the project costs of installing solar on multifamily affordable housing buildings in California. The stated goals of the MASH program are to stimulate the adoption of solar power in the affordable housing sector, decrease electricity use and costs without increasing monthly household expenses for affordable housing building occupants, and increase awareness of the benefits of solar among affordable housing occupants and developers. AB 217 (Bradford, 2013) extended the MASH and SASH programs of the California Solar Initiative with \$108 million in new funding and set several new goals for the programs. These goals included maximizing the overall benefit to ratepayers, requiring participants to enroll in the Energy Savings Assistance Program, and providing job training and employment opportunities in the solar energy and energy efficiency sectors of the economy.

² These sources include housing program funding, federal Investment tax credits, contributions from project reserves, and the use of energy savings resulting from the solar installations.

AB 693- FAQ

Split Incentive Barriers – For the MASH programs, the split incentives require property owners to subsidize solar investments that benefit tenants and not the property directly. Specifically, building owners must cross-subsidize solar installations serving tenant units or from the operational savings derived from common areas or from other resources available to the property owner. This outcome diverts resources that would otherwise be used for other important property uses and for preserving affordable housing assets. Further, these resources alone are not sufficient to cover the added costs of expanding solar systems to serve low-income tenant units.

Assumptions About Tenant Savings – Another false expectation is that a portion of tenant energy savings from solar installations can be recaptured by the property either from adjustments to rents or changes to utility allowances. Because MASH primarily serves publically supported and regulated housing multifamily housing markets, housing policies and guidance must be in place to recapture a portion of tenant energy savings benefits for use in financing solar PV investments. Such policies changes are either not possible because of regulatory restrictions or, in the case of the California Tax Credit Allocation Commission, have proven difficult to implement, effectively denying installations to tenants. Additionally, most residents in affordable multifamily housing pay discounted utility rates, which reduces the amount of energy saving that could be captured. This undermines the project economics to providing solar to tenants. Moreover, actions to capture savings from low-income tenants could be viewed as counter to the objective of providing low-income households with access to the benefits of clean energy technologies.

In summary, the CPUC and MASH Program Administrators, lacking expertise in affordable housing, have been unable to articulate a strategy to address real economic and split incentive barriers to delivering solar PV to multi-tenant buildings. As a result, MASH has not been effective in providing low-income renters with access to solar and the economic benefits from publicly supported PV installations. Conflicting mandates, economic realities, and split incentive barriers all require a fundamentally new approach to scale solar to reach low-income tenants. That is the purpose of Solar CARE.

AB 693 - FAQ

Question: What does Solar CARE provide that the MASH program does not?

The Solar CARE program provides several advantages over the MASH program. These advantages include:

- A specific goal and programmatic objective for targeting public resources to support PV installations serving low-income tenants in disadvantaged communities.
- A “low-income tenant first” approach to system design, financing, and installation that enables a broader distribution of benefits from solar installations between low-income tenants, property owners, ratepayers, and disadvantaged communities
- Comprehensive financing strategies that better align project costs and program incentives, and leverage financing products and resources that can be reliably captured by private markets to lower funding requirements and fully fund solar PV installations.
- Solutions to split-incentive barriers that provide property owners with safeguards for retaining energy savings realized from solar installations and incentives to undertaking solar installations providing benefits to tenants.
- Significant direct economic benefits to low-income renters.
- Green jobs benefiting residents in disadvantaged communities.
- Economic stimulus in disadvantaged communities through increased spending and jobs and improved health and environmental quality.
- Significant ratepayer benefits from CARE program savings.

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	2040 Jenny Lane	Fortuna	95540	Humboldt	50
	25100 Cypress Avenue	Hayward	94544	Alameda	54
	1414 Olive Drive	Davis	95616	Yolo	24
	2848 Schnell School Road	Placerville	95667	El Dorado	36
	4833 E. Lane	Fresno	93727	Fresno	4
	477 8th Street	Oakland	94607	Alameda	32
	1385 Griffith	Wasco	93280	Kern	44
	66 Longman Lane	Arnold	95223	Calaveras	35
	19734 Road 231	Strathmore	93267	Tulare	42
	855 West Visalia Road	Exeter	93221	Tulare	58
	1130 D Street	Los Banos	93635	Merced	38
	735 East Terra Bella	Pixley	93256	Tulare	40
	1400 South Green	Dinuba	93618	Tulare	44
	200 Greenley Road	Sonora	95370	Tuolumne	46
	2231 23rd Avenue	Oakland	94610	Alameda	4
	8300 MacArthur Blvd.	Oakland	94605	Alameda	20
	2648 Parker Avenue	Oakland	94605	Alameda	4
	990 East Springfield Avenue	Reedley	93654	Fresno	75
	4901 West Crenshaw Drive	Visalia	93277	Tulare	60
	6620 Collier Street	Upper Lake	95485	Lake	28
	14580 Olympic Drive	Clearlake	95422	Lake	27
	1313 Castillo Street	Santa Barbara	93101	Santa Barbara	3
	750 Oddstad Blvd.	Pacifica	94044	San Mateo	52
	172 South East	Reedley	93654	Fresno	23
	630 Baden Avenue	South San Francisc	94080	San Mateo	62
	850 E. Leland Road	Pittsburg	94565	Contra Costa	80
	655 Vine	Exeter	93221	Tulare	44
	3711 Cogswell Road	El Monte	91732	Los Angeles	58
	1184 Vetter Drive	Tulare	93274	Tulare	2
	27901 Huntwood Avenue	Hayward	94544	Alameda	40
	1714 Eleventh Street	Oakland	94607	Alameda	2
	998 Prospect Avenue	Hollister	95023	San Benito	14
	4035 Poinsettia Street	San Luis Obispo	93401	San Luis Obispo	20
	1340 Golden Gate Ave.	San Francisco	94115	San Francisco	32
	2837 Los Robles Road	Thousand Oaks	91362	Ventura	29
	975 45th Street	Oakland	94608	Alameda	2
	125 West Carrillo Street	Santa Barbara	93101	Santa Barbara	30
	1301 Fifth Avenue	San Diego	92101	San Diego	130
	2005 San Ramon Avenue	Mountain View	94043	Santa Clara	124
	76 Duane Street	San Jose	95110	Santa Clara	23
	113 Hooper Road	Wheatland	95692	Yuba	24
	321 Dorsey Drive	Grass Valley	95945	Nevada	34
	1814 Fifth Avenue	San Diego	92101	San Diego	80
	712 Sycamore Lane	Petaluma	94952	Sonoma	23
	100 Port Street	Point Arena	95468	Mendocino	26
	1401 Derosé Way	San Jose	95126	Santa Clara	76
	1740 Sutter Road	McKinleyville	95519	Humboldt	48
	800 Capehart Court	Ridgecrest	933550000	Kern	12
	350 Stewart Street	Blythe	92225	Riverside	2
	330 Stewart Street	Blythe	92225	Riverside	2
	3090 16th Street	San Francisco	94103	San Francisco	20
	409 Bruce Street	Yreka	96097	Siskiyou	36
	2675 Market Street	San Diego	92102	San Diego	14
	1276 N. Harper Avenue	West Hollywood	90046	Los Angeles	17
	10347 Willow Street	Jamestown	95327	Tuolumne	51
	705 West Sequoia Avenue	Woodlake	93286	Tulare	48
	48176 Lindsay Lane	Oakhurst	93644	Madera	37
	660 Bell Street	Los Alamos	93440	Santa Barbara	14
	5072 St. Andrew Road	Mariposa	95338	Mariposa	36
	2020 Cloverfield Blvd.	Santa Monica	90404	Los Angeles	32
	14930 Burns Valley Road	Clearlake	95492	Lake	40
	5363 Dent Avenue	San Jose	95118	Santa Clara	23
	5130 Case Avenue	Pleasanton	94566	Alameda	200
	5020 Coakley Circle	Mariposa	95338	Mariposa	32
	18 Clark Street	Cloverdale	95425	Sonoma	34
	2787 E Street	San Diego	92102	San Diego	22
	283 13th Street	Oakland	94612	Alameda	119
	1011 Newport Avenue	Orland	95963	Glenn	40

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	16716 San Luis Drive	Morgan Hill	95037	Santa Clara	20
	12435 Sixth Street	Yucaipa	92399	San Bernardino	51
	50 West Edmundson Avenue	Morgan Hill	95037	Santa Clara	20
	9005 Kern Avenue	Gilroy	95020	Santa Clara	24
	651 W. 6th Street	Gilroy	95020	Santa Clara	109
	1260 N. Harper Avenue	West Hollywood	90046	Los Angeles	22
	11128 Osage Avenue	Lennox	90304	Los Angeles	21
	1125 Oregon Street	Crescent City	95531	Del Norte	38
	11841 Old Tunnel Road	Nevada City	95945	Nevada	60
	1415 Hendley Circle	Santa Rosa	95404	Sonoma	27
	1828 17th Street	Santa Monica	90401	Los Angeles	7
	1515 Valdora Street	Davis	95616	Yolo	36
	9199 Fircrest Lane	San Ramon	94583	Contra Costa	120
	1544 Berkeley Avenue	Santa Monica	90401	Los Angeles	7
	2324 Shasta Drive	Davis	95616	Yolo	62
	1405 Caulfield Lane	Petaluma	94954	Sonoma	22
	1747 15th Street	Santa Monica	90401	Los Angeles	9
	1968 19th Street	Santa Monica	90401	Los Angeles	7
	8510 Brentwood Blvd.	Brentwood	94513	Contra Costa	28
	600 Embarcadero	San Francisco	94107	San Francisco	177
	2220 10th Avenue #100	Oakland	94606	Alameda	30
	2701 Erskine Creek Road	Lake Isabella	93240	Kern	46
	1094 East Washington Avenue	Earlimart	93219	Tulare	35
	21900 California Avenue	San Joaquin	93660	Fresno	20
	22200 California Avenue	San Joaquin	93660	Fresno	38
	970 Prospect Avenue	Hollister	95023	San Benito	42
	1761 Woodlands Avenue	East Palo Alto	94303	San Mateo	22
	801 Lyons Bald Mt. Road	Sonora	95370	Tuolumne	42
	1865 Walnut Avenue	Red Bluff	96080	Tehama	46
	15756 Paradise Avenue	Ivanhoe	93235	Tulare	54
	34 Banning Street	Avalon	90704	Los Angeles	80
	375 South Third Street	San Jose	95112	Santa Clara	63
	855 C Street	San Rafael	94901	Marin	60
	1206 Connecticut Street	San Francisco	94107	San Francisco	10
	800 The Embarcadero	San Francisco	94107	San Francisco	108
	225 Third Street	Greenfield	93927	Monterey	30
	548 Hunt Avenue	St. Helena	94574	Napa	56
	616 Ohlone Street	Davis	95616	Yolo	36
	34 Ortega Drive	Watsonville	95076	Santa Cruz	42
	66950 Ironwood Drive	Desert Hot Springs	92240	Riverside	96
	5896 East Avenue	Livermore	94550	Alameda	69
	909 Martin Circle	Petaluma	94952	Sonoma	32
	1110 Pacific Avenue	Santa Cruz	95060	Santa Cruz	44
	3253 Adeline Street	Berkeley	94703	Alameda	14
	1577 East Lassen Avenue	Chico	95973	Butte	76
	3601 N. Sunrise Way	Palm Springs	92262	Riverside	140
	3330 Army Street	San Francisco	94110	San Francisco	25
	201 Turk Street	San Francisco	94102	San Francisco	175
	111 Jones Street	San Francisco	94102	San Francisco	108
	638 East Adams	Santa Ana	92707	Orange	6
	16530 Palmer Avenue	Huron	93234	Fresno	54
	244 South Ventura Avenue	Farmersville	93223	Tulare	36
	41692 Road 105	Sultana	93666	Tulare	36
	561 A Street	Hayward	94541	Alameda	36
	1200 Rancho Drive	Hollister	95023	San Benito	54
	4984 Severance Drive	San Jose	95136	Santa Clara	79
	1105 Willow Road	Menlo Park	94025	San Mateo	6
	3120 Cunnison Lane	Soquel	95073	Santa Cruz	39
	634 Parr Avenue	Los Gatos	95030	Santa Clara	64
	844 Sharmon Palms Lane	Campbell	95008	Santa Clara	24
	781 East Cotati Avenue	Rohnert Park	94928	Sonoma	50
	990 College Avenue	St. Helena	94574	Napa	80
	1245 Grand Avenue	Escondido	92027	San Diego	21
	1252 Washington Avenue	Escondido	92027	San Diego	
	2425 Virginia Avenue	Santa Monica	90401	Los Angeles	13
	218 Leibrandt Street	Santa Cruz	95060	Santa Cruz	8
	639 West Worth Street	Stockton	95206	San Joaquin	31
	6215 Ocotillo	Twentynine Palms	92277	San Bernardino	65

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	1246 Third Avenue	Chula Vista	91911	San Diego	28
	201 North Raitt Street	Santa Ana	92703	Orange	6
	690 N Herbert Ave	Los Angeles	90063	Los Angeles	20
	10330 Preston Lane	Jamestown	95327	Tuolumne	56
	1333 South Greene	Dinuba	93221	Tulare	24
	2551 San Pablo Avenue	Oakland	94612	Alameda	43
	725 Pinewood Court	Williams	95987	Colusa	26
	732 North Clovis Avenue	Clovis	93611	Fresno	150
	3207 West Shields Avenue	Fresno	93722	Fresno	52
	1100 Second Street	Mendota	93640	Fresno	44
	18402 Tuolumne Road	Tuolumne	95379	Tuolumne	30
	227 West De La Guerra St.	Santa Barbara	93101	Santa Barbara	17
	2303 Yerba	Selma	93662	Fresno	5
	2304 Park	Selma	93662	Fresno	
	2901 Virginia Ave.	Bakersfield	93307	Kern	60
	1908 H Street	Bakersfield	93301	Kern	53
	19611 Elder Lane	Groveland	95321	Tuolumne	39
	1501 East Cypress Avenue	Tulare	93274	Tulare	52
	1217 North Laurel Avenue	West Hollywood	90046	Los Angeles	41
	1423 2nd Street	Santa Monica	90401	Los Angeles	44
	1289 Martha Way	Santa Rosa	95405	Sonoma	13
	2324 Meadow Way	Santa Rosa	95404	Sonoma	52
	6697 Old Redwood Highway	Windsor	95492	Sonoma	48
	2533 North Marks Ave.	Fresno	93722	Fresno	140
	7975 Sherwood Blvd.	Los Molinos	96055	Tehama	34
	301 Jacobs Place	Exeter	93221	Tulare	45
	1955 San Pablo Ave.	Oakland	94612	Alameda	144
	350 17th Street	San Diego	92101	San Diego	52
	11360 Sutton Way	Grass Valley	95945	Nevada	78
	11825 Old Tunnell Rd.	Grass Valley	95945	Nevada	34
	625 Berry Ave.	Hayward	94544	Alameda	50
	3210 Pearl Ave	San Jose	95136	Santa Clara	138
	518 Minna Street	San Francisco	94103	San Francisco	24
	1519 E Walnut	Orange	92867	Orange	22
	537 W Almond Ave	Orange	92867	Orange	
	16800 Fifth Street	Huron	93234	Fresno	35
	12200 Gateway Court	Auburn	95603	Placer	56
	705 Natoma Street	San Francisco	94103	San Francisco	104
	38 Brannan Street	Calistoga	94515	Napa	48
	978 Almaden Lake Dr	San Jose	95123	Santa Clara	144
	512 Spruce Street	Wheatland	95692	Yuba	88
	2001 Newton Avenue	San Diego	92113	San Diego	144
	2526 East Eighth St.	Davis	95616	Yolo	36
	2555 East 14th Street	Oakland	94601	Alameda	92
	1303 Larkin St	San Francisco	94109	San Francisco	63
	1028 Howard Street	San Francisco	94103	San Francisco	30
	1001 N Hickory Ave.	Compton	90220	Los Angeles	48
	490 Beck Street	Watsonville	95076	Santa Cruz	18
	170 Pennsylvania Dr.	Watsonville	95076	Santa Cruz	10
	907 East San Carlos Ave	San Carlos	94070	San Mateo	16
	241 6th Street	San Francisco	94103	San Francisco	140
	721 Wood Street	Oakland	94607	Alameda	22
	920 Regal Road	Encinitas	92024	San Diego	10
	2071 Amanda Way	Chico	95926	Butte	72
	1328 Second Street	Santa Monica	90401	Los Angeles	36
	575 Vallejo Street	Petaluma	94952	Sonoma	45
	3100 5th St	Davis	95616	Yolo	48
	14900 Burns Valley Road	Clearlake	95422	Lake	22
	648 East Main Street	Stockton	95202	San Joaquin	72
	700 Alhambra Ave.	Martinez	94553	Contra Costa	75
	440 Valencia Street	San Francisco	94103	San Francisco	58
	2400 Goldenrod	Oildale	93308	Kern	134
	815 E. Calaveras Street	Altadena	91001	Los Angeles	22
	11720 San Pablo Ave.	El Cerrito	94530	Contra Costa	135
	300 Enterprise Drive	Rohnert Park	94928	Sonoma	230
	2030 Pajaro Lane	Freedom	95019	Santa Cruz	130
	100 Duranzo Aisle	Irvine	92606	Orange	382
	2160 North Schnoor Avenue	Madera	93637	Madera	136

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	400 Morgan St	Winters	95694	Yolo	38
	22150 California St	San Joaquin	93660	Fresno	42
	3037 N. Main Street	Walnut Creek	94596	Contra Costa	36
	4710 Campbell Ave	San Jose	95130	Santa Clara	98
	22702 Pacific Park Dr	Aliso Viejo	92656	Orange	128
	112 Alves Lane	Bay Point	94565	Contra Costa	14
	190 Sierra Court	Hollister	95023	San Benito	19
	530 Andalucia Drive	Soledad	93960	Monterey	40
	675 Mitchell Avenue	Oroville	95965	Butte	156
	36523 25th Street East	Palmdale	93550	Los Angeles	304
	229 E Amerige Ave.	Fullerton	92832	Orange	59
	375 Oaktree Drive	Mountain View	94040	Santa Clara	107
	174 Carroll Street	Sunnyvale	94086	Santa Clara	121
	2455 West Capitol Avenue	West Sacramento	95691	Yolo	50
	711 5th St	McFarland	93250	Kern	52
	910 Donlon Ave	Oxnard	93030	Ventura	32
	1555 E. South Avenue	Orange Cove	93646	Fresno	188
	10130 Valley Blvd.	El Monte	91731	Los Angeles	90
	2700 N. Willis St.	Visalia	93291	Tulare	8
	464 Main St	Piru	93040	Ventura	35
	1107 Luchessi Drive	San Jose	95118	Santa Clara	102
	840 East Travis Blvd.	Fairfield	94533	Solano	76
	601 Sunrise Avenue	Madera	93638	Madera	52
	1105 Tulare Street	Parlier	93648	Fresno	41
	3431 Spruce Ave	South Lake Tahoe	96150	El Dorado	28
	2205 Colonial Village	Auburn	95603	Placer	56
	1355 South Ave	Orange Cove	93221	Fresno	54
	20939 Guerrero Ave	Richgrove	93261	Tulare	35
	7622 Katella Avenue	Stanton	90680	Orange	335
	9000 Campina Drive	La Mesa	92941	San Diego	60
	3433 Palmer Drive	Cameron Park	95682	El Dorado	80
	6508 Rita Avenue	Huntington Park	90255	Los Angeles	103
	634 15th Street	Oakland	94612	Alameda	200
	702 N. San Joaquin	Stockton	95202	San Joaquin	30
	1405 Cypress Point Lane	Ventura	93003	Ventura	104
	181 Rawls Place	San Jose	95139	Santa Clara	84
	115 East Reed Street	San Jose	95112	Santa Clara	53
	10210 San Diego Mission Rd	San Diego	92108	San Diego	77
	1706 Branham Lane	San Jose	95118	Santa Clara	51
	815 Ashland Avenue	Santa Monica	90405	Los Angeles	45
	22121 S. Avalon Blvd.	Carson	90745	Los Angeles	91
	15811 Alicante Road	La Mirada	90638	Los Angeles	100
	358 Haversack	Sea Ranch	95497	Sonoma	31
	443 East Sonora	Stockton	95202	San Joaquin	69
	644 14th Street	Oakland	94612	Alameda	73
	1745 E Fairway Drive	Orange	92866	Orange	50
	1223 Webster Street	San Francisco	94115	San Francisco	120
	3460 North Brawley	Fresno	93722	Fresno	14
	705 Northrup Street	San Jose	95126	Santa Clara	51
	2094 Forest Ave	San Jose	95128	Santa Clara	109
	2036 Evans Lane	San Jose	92125	Santa Clara	50
	26196 Crown Valley Parkway	Mission Viejo	92692	Orange	155
	3082 Sunset Avenue	Marina	93933	Monterey	39
	1995 North Lake St.	Madera	93638	Madera	76
	100 S. Indian Hill Blvd.	Claremont	91711	Los Angeles	154
	3 Osborne	Irvine	92714	Orange	116
	1000 Thompkins Ave	San Francisco	94110	San Francisco	46
	430 28th Street	Oakland	94612	Alameda	20
	435 Beaver Street	Santa Rosa	95404	Sonoma	34
	615 West Seventh Street	Antioch	94509	Contra Costa	82
	949 E Annadale Avenue	Fresno	93706	Fresno	222
	1117 Elm Street	Long Beach	90813	Los Angeles	25
	421 W. 33rd Street	Long Beach	90806	Los Angeles	24
	165 Lavell Village Circle	Santa Rosa	95403	Sonoma	49
	720 Fifth Avenue	Monrovia	91016	Los Angeles	115
	2612 Elm Court	Morro Bay	93442	San Luis Obispo	21
	1201 Amherst Dr	King City	93930	Monterey	50
	5499 Grey Goose Gulch Drive	Carmel Valley	93924	Monterey	9

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	445 Maple St	West Sacramento	95691	Yolo	40
	587 Natoma Street	San Francisco	94103	San Francisco	29
	13785 East Manning Avenue	Parlier	93648	Fresno	148
	1780 Old Oakland Rd	San Jose	95131	Santa Clara	246
	1445 Harrison Street	Oakland	94612	Alameda	106
	745 McDowell Blvd.	Petaluma	94952	Sonoma	129
	120 Santa Alicia Ave	Rohnert Park	94928	Sonoma	20
	5000 Kelsey Lane	Oakley	94561	Contra Costa	50
	9997 Feron Blvd.	Rancho Cucamong	91730	San Bernardino	88
	6421 Tobria Terrace	Carlsbad	92009	San Diego	344
	52 Terrace Way	Marin City	94965	Marin	30
	424 Rancheria Street	Santa Barbara	93103	Santa Barbara	14
	4127 West Valencia	Fullerton	92633	Orange	108
	2810 Warner Avenue	Irvine	92606	Orange	194
	4006A Via Lucero	Santa Barbara	93110	Santa Barbara	74
	600 Flume St	Chico	95928	Butte	56
	351 South Elm Street	Arroyo Grande	93420	San Luis Obispo	28
	2060 East Spruce Ave	Fresno	93720	Fresno	100
	4301 Fruitvale Ave	Bakersfield	93308	Kern	110
	870 N Plano	Porterville	93257	Tulare	60
	3525 Lyon Avenue	Oakland	94601	Alameda	106
	678 Buttonwillow	Chico	95926	Butte	57
	600 Morning Drive	Bakersfield	93306	Kern	112
	2140 East Chapman Avenue	Fullerton	92821	Orange	27
	990 Ely Road	Petaluma	94954	Sonoma	74
	5398 Monterey Road	San Jose	95111	Santa Clara	150
	16 15th Street	San Diego	92101	San Diego	175
	2555 Church Lane	San Pablo	94806	Contra Costa	22
	504 West Franklin Street	Monterey	93940	Monterey	6
	555 Ellis Street	San Francisco	94109	San Francisco	38
	15750 Knowles Lane	Middletown	95461	Lake	36
	350 Bret Harte Lane	Murphys	95247	Calaveras	24
	2701 Erskine Creek Road	Lake Isabella	93240	Kern	40
	960 Prospect Ave	Hollister	95023	San Benito	30
	791 E Webb St	Montague	96064	Siskiyou	28
	3201 Merrill Road	Aptos	95003	Santa Cruz	15
	70 Calaveras Court	Napa	94559	Napa	51
	1105 Laurel	San Luis Obispo	93401	San Luis Obispo	24
	1301 Morningview Drive	Escondido	92026	San Diego	190
	600 P Street	Firebaugh	93622	Fresno	40
	300 Myer Drive	Chowchilla	93610	Madera	54
	250 Divisadero Avenue	Corning	96021	Tehama	38
	5075 St. Andrews Road	Mariposa	95338	Mariposa	34
	4006 Via Lucero	Santa Barbara	93110	Santa Barbara	40
	1120 Heidi Drive	Greenfield	93927	Monterey	28
	1120 Heidi Drive	Greenfield	93927	Monterey	30
	1051 Paseo Grande	Salinas	93905	Monterey	100
	353 Ventana Avenue	Greenfield	93926	Monterey	1
	1120 Heidi Drive	Greenfield	93927	Monterey	30
	1415 Harrison Street	Oakland	94602	Alameda	81
	3021 Huff Avenue	San Jose	95128	Santa Clara	72
	4576 Florence Avenue	Bell	90201	Los Angeles	13
	2440 Barry St	Camarillo	93010	Ventura	13
	1900 Poco Way	San Jose	95122	Santa Clara	129
	205 Jones Street	San Francisco	94102	San Francisco	51
	21 Columbia Square	San Francisco	94103	San Francisco	50
	1101 Howard Street	San Francisco	94103	San Francisco	34
	7000 Auburn Street	Bakersfield	93306	Kern	160
	3048 16th Street	San Francisco	94103	San Francisco	88
	181 East Honolulu Street	Lindsay	93247	Tulare	29
	101 East Adell Street	Madera	93637	Madera	81
	245 Cedar Road	Vista	92084	San Diego	40
	1070 Almond Ave	Arbuckle	95912	Colusa	36
	11515 Budlong Avenue	Los Angeles	90044	Los Angeles	51
	840 Park Meadows Avenue	Bakersfield	93308	Kern	140
	248 Valencia Blvd.	Woodlake	93286	Tulare	47
	1102 Ironbark	San Luis Obispo	93401	San Luis Obispo	20
	1685 First Street	Lincoln	95648	Placer	88

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	6507 Danny Drive	Stockton	95210	San Joaquin	132
	232 North Shasta Street	Farmersville	93223	Tulare	20
	8190 13th Street	Westminster	92683	Orange	133
	1095 Kendall Drive	San Bernardino	92407	San Bernardino	178
	1500 South Orange Place	Escondido	92025	San Diego	32
	426 Main Street	Woodland	95695	Yolo	76
	522 Roosevelt Street	Salinas	93905	Monterey	22
	250 San Vicente Road	Soledad	93960	Monterey	50
	1923 Dartmouth Way	Salinas	93906	Monterey	100
	851 22nd Avenue	Delano	93215	Kern	128
	76 Murphy Crossing Road	Watsonville	95076	Santa Cruz	18
	950 Main Street	Redwood City	94063	San Mateo	81
	801 Almond Court	Wasco	93280	Kern	36
	1290 Potrero Avenue	San Francisco	94110	San Francisco	20
	3101 21st Street	San Francisco	94110	San Francisco	30
	2400 Gloria Way	East Palo Alto	94303	San Mateo	38
	1101 Main Street	Half Moon Bay	94019	San Mateo	36
	20 West Pickering Avenue	Fremont	94536	Alameda	43
	439 Centennial Drive	Hanford	93231	Kings	81
	7251 Brentwood Blvd.	Brentwood	94513	Contra Costa	126
	729 Hayes Street	San Francisco	94102	San Francisco	84
	125 Sycamore Street	Santa Cruz	95060	Santa Cruz	60
	140 Jones Street	San Francisco	94102	San Francisco	58
	250 McAllister Street	San Francisco	94102	San Francisco	63
	500 7th St	West Sacramento	95605	Yolo	90
	5225 Terner Way	San Jose	95136	Santa Clara	135
	100 Santorini	Irvine	92606	Orange	84
	21000 Wilbeam Avenue	Castro Valley	94546	Alameda	97
	88 Perry Street	San Francisco	94107	San Francisco	257
	1883 Rumrill Blvd.	San Pablo	94806	Contra Costa	32
	510 21st Street	Oakland	94612	Alameda	93
	6200 Victor Street	Bakersfield	93308	Kern	128
	479 Natoma Street	San Francisco	94103	San Francisco	30
	2300 Van Ness Avenue	San Francisco	94109	San Francisco	22
	1401 Union Ave	Fairfield	94533	Solano	32
	6119 Danny Drive	Stockton	95210	San Joaquin	40
	377 West Mt. Diablo Avenue	Tracy	95376	San Joaquin	37
	360 Meridian Avenue	San Jose	95132	Santa Clara	90
	500 Hobson Way	Oxnard	93030	Ventura	64
	321 Cecilia Way	Tiburon	94920	Marin	16
	3072 Chateau Road	Mammoth Lakes	93546	Mono	30
	125 Sixth Street	San Francisco	94103	San Francisco	75
	260 Farrell Avenue	Gilroy	95020	Santa Clara	74
	160 Sycamore Avenue	Brentwood	94513	Contra Costa	80
	2789 Ray Lawyer Drive	Placerville	95667	El Dorado	76
	420 Sands Drive	San Jose	95125	Santa Clara	112
	21797 South Reynolds Avenue	South Dos Palos	93665	Merced	32
	31300 Auto Center Drive	Lake Elsinore	92530	Riverside	126
	230 East Dunne Avenue	Morgan Hill	95037	Santa Clara	76
	1515 E Bianchi Road	Stockton	95210	San Joaquin	82
	990 Fox Street	Lemoore	93245	Kings	80
	670 West San Jose Avenue	Claremont	91711	Los Angeles	48
	1380 Blossom Hill Road	San Jose	95118	Santa Clara	80
	1519 West 8th Street	San Bernardino	92411	San Bernardino	44
	780 South Lyon Street	Santa Ana	92705	Orange	500
	3138 E. Maple Ave	Orange	92869	Orange	260
	31641 Rancho Viejo Road	San Juan Capistrano	92675	Orange	112
	21309 Bloomfield Ave.	Lakewood	90712	Los Angeles	85
	4502 West 186th Street	Torrance	90503	Los Angeles	187
	100 Village Lane	Foster City	94404	San Mateo	60
	860 Mantelli Drive	Gilroy	95020	Santa Clara	33
	1144 5th Street	Santa Monica	90403	Los Angeles	32
	228 Sutton Way	Grass Valley	95945	Nevada	80
	11190 Mesquite Avenue	Desert Hot Springs	92240	Riverside	51
	688 Vineyard Road	San Marcos	92069	San Diego	62
	1819 Tipton Street	Visalia	93291	Tulare	10
	1835 Liberty Court	Visalia	93291	Tulare	
	1832 Thomas Court	Visalia	93291	Tulare	

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	5225 Elizabeth Street	Cudahy	90201	Los Angeles	26
	605 East New Love Drive	Santa Maria	93454	Santa Barbara	23
	11725 Old Tunnel Road	Grass Valley	95945	Nevada	32
	163 South Elm Street	Arroyo Grande	93420	San Luis Obispo	20
	201 8th Street	Taft	93268	Kern	61
	422 Valencia Street	San Francisco	94103	San Francisco	81
	180 Sycamore Avenue	Brentwood	94513	Contra Costa	80
	9250 Wren Avenue	Gilroy	95020	Santa Clara	74
	121 West Hills Circle	Sebastopol	95472	Sonoma	24
	1115 S. Tremont	Oceanside	92054	San Diego	21
	2425 Shattuck Avenue	Berkeley	94704	Alameda	27
	225 W. Fruitvale Avenue	Hemet	92543	Riverside	73
	24115 Cottonwood Avenue	Moreno Valley	92553	Riverside	109
	1885 Madison Street	Bakersfield	93307	Kern	56
	10800 Laurel Avenue	Whittier	90605	Los Angeles	50
	2836 Schoolhouse Lane	Cambria	93428	San Luis Obispo	24
	131 Landis Avenue	Watsonville	95076	Santa Cruz	28
	260 North Third Avenue	Upland	91786	San Bernardino	130
	11380 Court Street	Stanton	90680	Orange	103
	2242 E. El Segundo Blvd.	Compton	90222	Los Angeles	25
	2317 West Avenue J-8	Lancaster	93534	Los Angeles	77
	10 Jeanette Prandi Way	San Rafael	94903	Marin	80
	3355 Elm Street	San Diego	92102	San Diego	32
	579 Vallejo Street	Petaluma	94952	Sonoma	40
	536 Fifth Avenue	San Diego	92101	San Diego	41
	2361 Bass Lake Road	Cameron Park	95682	El Dorado	88
	18555 Butterfield Blvd	Morgan Hill	95037	Santa Clara	80
	1200 Lick Avenue	San Jose	95110	Santa Clara	66
	355 Race Street	San Jose	95126	Santa Clara	138
	620 Walnut Ave	Brea	92821	Orange	46
	3125 Garnet Lane	Fullerton	92632	Orange	18
	10260 Preston Lane	Jamestown	95327	Tuolumne	80
	955 North A Street	Tulare	93274	Tulare	40
	2001 Miramontes Road	Half Moon Bay	94019	San Mateo	80
	1616 East Rock Creek Drive	Orange	92866	Orange	83
	7252 Melrose Street	Buena Park	90621	Orange	59
	5948 Victor Street	Bakersfield	93308	Kern	95
	1701 Bush Street	Oceanside	92058	San Diego	136
	1011 W. 91st Street	Los Angeles	90044	Los Angeles	30
	3780 West Dakota	Fresno	93722	Fresno	4
	4111 Tyler Avenue	El Monte	91731	Los Angeles	137
	110 Martinez Place	Soledad	93960	Monterey	46
	980 Palm Avenue	West Hollywood	90069	Los Angeles	40
	200 South Albany Street	Delano	93215	Kern	80
	11 Camino de Vida	Santa Barbara	93111	Santa Barbara	118
	2040 Grant Street	Stockton	95206	San Joaquin	40
	1414 North Broadway	Santa Maria	93454	Santa Barbara	104
	67200 Hacienda Avenue	Desert Hot Springs	92240	Riverside	48
	108 H Street	Crescent City	95531	Del Norte	56
	215 Second Street	San Mateo	94401	San Mateo	56
	3155 Los Robles Road	Thousand Oaks	91362	Ventura	11
	551 South Third St.	Blythe	92225	Riverside	58
	4355 Renaissance Drive	San Jose	95134	Santa Clara	637
	955 North Palmetto Street	Ontario	91762	San Bernardino	80
	557 Laguna Drive	Rohnert Park	94928	Sonoma	168
	1325 40th Street	Emeryville	94608	Alameda	220
	1301 Stevenson Boulevard	Fremont	94538	Alameda	60
	1475 167th Ave	San Leandro	94578	Alameda	80
	16331 McFadden Ave	Tustin	92780	Orange	350
	234 West Kalmia Street	Fallbrook	92028	San Diego	28
	4401 Renaissance Drive	San Jose	95134	Santa Clara	120
	4501 Renaissance Drive	San Jose	95134	Santa Clara	140
	1275 South Winery Ave.	Fresno	93727	Fresno	248
	2901 N Bristol St	Santa Ana	92706	Orange	274
	598 Columbia Avenue	San Jose	95126	Santa Clara	110
	14449 Begonia Road	Victorville	92392	San Bernardino	116
	12184 Hanford Armona Road	Hanford	93230	Kings	81
	2404 East Donlon Street	Blythe	92225	Riverside	81

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	1095 Mission Street	San Francisco	94103	San Francisco	72
	525 Vera Cruz Way	Shafter	93263	Kern	80
	160 Nettleton Road	Vista	92083	San Diego	28
	43280 Bryant Terrace	Fremont	94539	Alameda	60
	1901 South Azusa Avenue	Hacienda Heights	91743	Los Angeles	152
	11439 Columbia Village Drive	Sonora	95370	Tuolumne	80
	333 Taylor Street	San Francisco	94102	San Francisco	53
	523 Rush Drive	San Marcos	92078	San Diego	168
	35055 Melrose Drive	Cathedral City	92234	Riverside	39
	365 Sequoia Street	Morro Bay	93442	San Luis Obispo	12
	6035 Service Road	Diamond Springs	95619	El Dorado	62
	350 Duncan Drive	Windsor	95492	Sonoma	80
	2161 Crestview Drive	Pittsburg	94565	Contra Costa	76
	201 Pennsylvania Avenue	Fairfield	94533	Solano	60
	425 West 11th Avenue	Escondido	92025	San Diego	16
	13250 Civic Center Drive	Poway	92064	San Diego	91
	1662 Rory Lane	Simi Valley	93063	Ventura	69
	147 Colgan Avenue	Santa Rosa	95404	Sonoma	120
	1832 Merced Street	Madera	93637	Madera	60
	1341 South Sepulveda Boulev	Los Angeles	90025	Los Angeles	41
	535 Minna Street	San Francisco	94103	San Francisco	26
	119 Juniper Street	Arroyo Grande	93420	San Luis Obispo	14
	858 East Grand Avenue	Pomona	91766	Los Angeles	62
	351 South 33rd Street	San Diego	92113	San Diego	40
	2800 Vineyard Avenue	Oxnard	93030	Ventura	62
	855 North Brea Blvd.	Brea	92821	Orange	105
	941 Sunset Garden Lane	Simi Valley	93065	Ventura	136
	2145 Stony Point Road	Santa Rosa	95407	Sonoma	70
	2700 Alvingroom Court	Oakland	94614	Alameda	120
	5159 Clara Street	Cudahy	90201	Los Angeles	36
	157 South 19th Avenue	Lemoore	93245	Kings	79
	965 Lundy Avenue	San Jose	95133	Santa Clara	25
	501 Monterey Street	Madera	93637	Madera	75
	19499 Hess Avenue	Sonora	95370	Tuolumne	60
	16576 Sultana Street	Hesperia	92345	San Bernardino	89
	3850 San Pablo Avenue	Emeryville	94608	Alameda	67
	1910 Fullerton Avenue	Corona	92881	Riverside	200
	218 Parkview South	Orcutt	93455	Santa Barbara	80
	1640 Hermocilla Way	San Jose	95116	Santa Clara	99
	3030 New Jersey Way	Placerville	95667	El Dorado	77
	3840 Market Court	Shingle Springs	95682	El Dorado	71
	1307 Laurel Tree Lane	Carlsbad	92008	San Diego	138
	750 Ada Street	Chula Vista	91911	San Diego	18
	1195 E. Hanford Armona Roac	Lemoore	93245	Kings	99
	5300 Case Avenue	Pleasanton	94566	Alameda	68
	5300 Case Avenue	Pleasanton	94566	Alameda	78
	1001 West Gonzales Road	Oxnard	93030	Ventura	213
	18555 Butterfield Blvd.	Morgan Hill	95037	Santa Clara	16
	9609 Base Line Road	Rancho Cucamong	91730	San Bernardino	158
	1685 First Street	Lincoln	95648	Placer	120
	1001 South Main Street	Milpitas	95035	Santa Clara	303
	9777 Bixby Avenue	Garden Grove	92841	Orange	125
	34 17th Street	San Diego	92101	San Diego	47
	1725 N. Marks Avenue	Fresno	93722	Fresno	132
	1280 East J Street	Chula Vista	91910	San Diego	40
	817 Eta Street	National City	91950	San Diego	268
	820 South E Street	Oxnard	93030	Ventura	195
	1350 E. San Bernardino Road	West Covina	91791	Los Angeles	122
	472 Regency Circle	Salinas	93906	Monterey	119
	2175 Shurtleff Avenue	Napa	94558	Napa	14
	2020 Clay Street	Napa	94559	Napa	25
	810 Hillsdale Avenue	San Jose	95136	Santa Clara	180
	8101 Cerritos Avenue	Stanton	90680	Orange	297
	1718 Panama Lane	Bakersfield	93307	Kern	136
	241 Wisconsin Avenue	El Cajon	92020	San Diego	56
	101 West Weddell Drive	Sunnyvale	94089	Santa Clara	193
	460 North Shoreline Blvd	Mountain View	94043	Santa Clara	119
	508 East Mission Avenue	Escondido	92025	San Diego	61

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	604 Richmar	San Marcos	92069	San Diego	69
	915 Highland Avenue	Duarte	91010	Los Angeles	120
	3333 F Street	Davis	95616	Yolo	36
	2999 North Texas Street	Fairfield	94533	Solano	112
	2496 Old Stony Point Road	Santa Rosa	95407	Sonoma	66
	6806 Phelps Road	Goleta	93117	Santa Barbara	36
	100 Harden Parkway	Salinas	93906	Monterey	208
	5303 Stonehaven Drive	Yorba Linda	92887	Orange	125
	1528 India Street	San Diego	92101	San Diego	16
	738 Mikkelsen Drive	Auburn	95603	Placer	42
	1655 Third Street	Lincoln	95648	Placer	70
	12199 Gateway Court	Auburn	95603	Placer	60
	10203 San Pablo Avenue	El Cerrito	94530	Contra Costa	29
	1450 South Perris Blvd.	Perris	92570	Riverside	80
	1500 Poplar Avenue	Wasco	93280	Kern	40
	590 Central Avenue	Buellton	93427	Santa Barbara	12
	9800 7th Avenue	Hesperia	92345	San Bernardino	113
	37850 20th Street East	Palmdale	93550	Los Angeles	144
	6701 Auburn Street	Bakersfield	93306	Kern	74
	400 South Blackstone Street	Tulare	93274	Tulare	61
	87 E. Jarvis Street	Perris	92571	Riverside	71
	248 Rey Street	San Francisco	94134	San Francisco	148
	230 East Dunne Avenue	Morgan Hill	95037	Santa Clara	72
	40 Valle Vista Avenue	Vallejo	94590	Solano	96
	30 Novato Street	San Rafael	94901	Marin	39
	504 Roosevelt Street	Salinas	93905	Monterey	22
	301 South San Joaquin Street	Stockton	95202	San Joaquin	20
	13232 South Avalon Blvd.	Los Angeles	900610000	Los Angeles	42
	3625 Williams Avenue	La Verne	91750	Los Angeles	110
	1259 Belridge Street	Oceano	93445	San Luis Obispo	12
	6035 College View Drive	Marysville	95901	Yuba	103
	3101 Mission Street	San Francisco	94110	San Francisco	55
	16733 Sunhill Drive	Victorville	92392	San Bernardino	83
	3955 Vistapark Drive	San Jose	95132	Santa Clara	83
	1719 South Oxnard Boulevard	Oxnard	93030	Ventura	107
	12135 Royal Road	San Diego	92021	San Diego	120
	1550 South Avenue	Orange Cove	93646	Fresno	81
	380 Pacheco Road	Bakersfield	93307	Kern	112
	711 South C Street	Oxnard	93030	Ventura	22
	43862 15th Street West	Lancaster	93534	Los Angeles	132
	1565 El Camino Real	South San Francisc	94080	San Mateo	34
	734 Harris Court	Hayward	94544	Alameda	20
	909 Meyer Street	Arvin	93203	Kern	45
	1404 5th Avenue	San Diego	92101	San Diego	21
	1601 Creekside	Madera	93638	Madera	81
	2801 Clay Street	Placerville	95677	El Dorado	81
	220 South Garcia Street	Santa Paula	93060	Ventura	14
	13708 San Antonio Drive	Norwalk	90650	Los Angeles	65
	4160 East Avenue R	Palmdale	93552	Los Angeles	200
	3869 Swift	San Diego	92105	San Diego	170
	3756 Marlborough	San Diego	92105	San Diego	
	3610 Van Dyke	San Diego	92105	San Diego	
	4054 44th Street	San Diego	92105	San Diego	
	4043 45th Street	San Diego	92105	San Diego	
	4118 Menlo	San Diego	92105	San Diego	
	4201 Euclid	San Diego	92105	San Diego	
	4115 Estrella	San Diego	92105	San Diego	
	4066 Arizona	San Diego	92105	San Diego	244
	4045 Texas	San Diego	92105	San Diego	
	4326 Illinois	San Diego	92105	San Diego	
	4760 32nd Street	San Diego	92105	San Diego	
	4614 33rd Street	San Diego	92105	San Diego	
	4620 Wilson	San Diego	92105	San Diego	
	3538 Madison	San Diego	92105	San Diego	
	3834 Edna	San Diego	92105	San Diego	
	4533 37th Street	San Diego	92105	San Diego	
	4437 39th Street	San Diego	92105	San Diego	
	6625 Tait Street	San Diego	92105	San Diego	

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	1555 Turk Street	San Francisco	94115	San Francisco	52
	1032 Mohr Lane	Concord	94518	Contra Costa	130
	100 Gables Ave.	Vacaville	95688	Solano	65
	4500 Montecito Drive	La Palma	90623	Orange	35
	1250 Santa Cora Avenue	Chula Vista	91913	San Diego	440
	80 West Hookston Road	Pleasant Hill	94523	Contra Costa	100
	1045 Coleman Road	San Jose	95123	Santa Clara	250
	13380 Hillsborough Drive	La Mirada	90638	Los Angeles	160
	1438 16th Street	Santa Monica	90404	Los Angeles	17
	200 S. Glenn Drive	Camarillo	93010	Ventura	151
	214 North 8th Street	Santa Paula	90360	Ventura	56
	1621 Mesa Drive	Newport Beach	92660	Orange	74
	5158 North Ninth Street	Fresno	93710	Fresno	240
	4885 North Recreation	Fresno	93726	Fresno	204
	1675 Nelson Blvd.	Selma	93662	Fresno	38
	415 Country Club Drive	Simi Valley	93065	Ventura	148
	7367 Central Avenue	Highland	92346	San Bernardino	185
	39150 Sundale Drive	Fremont	94538	Alameda	132
	1000 Blossom River Way	San Jose	95123	Santa Clara	144
	2455 West Capitol Avenue	West Sacramento	95691	Yolo	74
	1250 Sunnydale Avenue	San Francisco	94134	San Francisco	92
	4343 Elizabeth Street	Cudahy	90201	Los Angeles	99
	545 North Mollison Avenue	El Cajon	92021	San Diego	148
	4500 Alhambra Drive	Davis	95616	Yolo	70
	1813 Marlesta Court	Pinole	94564	Contra Costa	144
	13160 6th Street	Chino	91708	San Bernardino	104
	855 East Tabor Avenue	Fairfield	94533	Solano	148
	1333 West Garvey North	West Covina	91790	Los Angeles	124
	7799 Valley View Street	La Palma	90623	Orange	269
	850 Russell Avenue	Santa Rosa	95403	Sonoma	206
	1180 West San Isidro Blvd.	San Ysidro	92173	San Diego	161
	339-340 Marcos Street	San Marcos	92069	San Diego	136
	1920 South Batson Avenue	Rowland Heights	92673	Los Angeles	332
	3225 Harbor Street	Pittsburg	94565	Contra Costa	126
	1602 Nisson Road	Tustin	92608	Orange	150
	819 East Hammer Lane	Stockton	95210	San Joaquin	186
	1850 Rodgers Road	Hanford	93230	Kings	70
	1300 North Shaffer Avenue	Orange	92867	Orange	64
	3030 5th Street	Davis	95616	Yolo	58
	735 West Everding Street	Eureka	95503	Humboldt	22
	4066 Messina Drive	San Diego	92113	San Diego	145
	2230 Latham Street	Mountain View	94040	Santa Clara	74
	860 Herman Avenue	Livermore	94550	Alameda	72
	1985 San Luis Street	Los Banos	93635	Merced	80
	5241 North Fresno Street	Fresno	93710	Fresno	406
	1300 Minniwawa	Clovis	93612	Fresno	130
	400 West Orangethorpe Aven	Fullerton	92832	Orange	224
	298 West Chanslor Avenue	Richmond	94801	Contra Costa	100
	26705 Bouquet Canyon Road	Santa Clarita	91350	Los Angeles	264
	245 W. Weddell Drive	Sunnyvale	94089	Santa Clara	62
	1590 West Garvey Avenue	Monterey Park	91754	Los Angeles	61
	28497 Pujol Street	Temecula	92589	Riverside	76
	1379 E. Thousand Oaks Blvd.	Thousand Oaks	91360	Ventura	80
	1755 East Roberts	Fresno	93710	Fresno	143
	90 Sierra Vista Avenue	Mountain View	94043	Santa Clara	149
	201 Maine Street	Vallejo	94590	Solano	88
	201 Maine Street	Vallejo	94590	Solano	148
	135 Carolina Street	Vallejo	94590	Solano	152
	1025 Rose Marie Lane	Stockton	95702	San Joaquin	80
	246 Iris Avenue	Stockton	95210	San Joaquin	80
	611 Brizzolara	San Luis Obispo	93401	San Luis Obispo	30
	14681 Lost Hills Road	Lost Hills	93249	Kern	41
	1850 South College Avenue	Dinuba	93618	Tulare	54
	225 Meyer Street	Arvin	93203	Kern	61
	845 Broadway	Chula Vista	91910	San Diego	42
	1055 South Sixth Street	San Jose	95112	Santa Clara	148
	1058 South Fifth Street	San Jose	95112	Santa Clara	
	297 Myer Drive	Chowchilla	93610	Madera	81

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	1988 Trinity Avenue	Walnut Creek	94596	Contra Costa	17
	300 Rios Street	Mendota	93640	Fresno	81
	1550 East Church Avenue	Fresno	93706	Fresno	142
	1566 Scott Street	San Jose	95123	Santa Clara	71
	801 14th Street	Oakland	94612	Alameda	117
	1121 Back Bay Drive	Newport Beach	92660	Orange	120
	16838 Ceres Avenue	Fontana	92335	San Bernardino	93
	14608 W. Kearney Street	Kerman	93630	Fresno	81
	240 Chestnut Avenue	Long Beach	90802	Los Angeles	196
	1165 D Street	Lemoore	93245	Kings	36
	116 Campus Drive	Hanford	93230	Kings	48
	1741 Cheatham Ave.	Bakersfield	93307	Kern	86
	235 East Santa Clara Street	San Jose	95113	Santa Clara	59
	124 W. Beach Street	Watsonville	95076	Santa Cruz	40
	310 East Dunne Avenue	Morgan Hill	95037	Santa Clara	38
	340 Valencia Street	San Francisco	94103	San Francisco	260
	4200 Calle Real	Santa Barbara	93110	Santa Barbara	75
	201 East Alaska Avenue	Fairfield	94533	Solano	30
	1897 Oakmead Drive	Concord	94520	Contra Costa	124
	210 San Antonio Circle	Mountain View	94040	Santa Clara	120
	6818 Lion Way	Oakland	94621	Alameda	115
	200 Fuente Lane	Sonoma	95476	Sonoma	80
	3412 Beyer Boulevard	San Diego	92173	San Diego	60
	650 Jewell Avenue	Pacific Grove	93950	Monterey	49
	2000 Imola Avenue	Napa	94559	Napa	29
	130 Scoggins Court	Vacaville	95688	Solano	134
	5 Hutchins Way	Novato	94949	Marin	220
	8845 Citrus Avenue	Fontana	92335	San Bernardino	51
	25952 Via Lomas	Laguna Hills	92653	Orange	51
	27 Lake Road	Irvine	92604	Orange	165
	15554 Gale Avenue	Hacienda Heights	91745	Los Angeles	75
	2640 La Crescenta Drive	Cameron Park	95682	El Dorado	40
	11950 Centralia Road	Hawaiian Gardens	90716	Los Angeles	264
	455 Colusa Avenue	Chowchilla	93610	Madera	38
	608 Kennedy Court	Fairfield	94533	Solano	24
	1775 Waring Street	Seaside	93955	Monterey	133
	500 S. Rancho Santa Fe Road	San Marcos	92078	San Diego	120
	1550 Valley Glen Drive	Dixon	95620	Solano	102
	2300 Lancaster Drive	Richmond	94806	Contra Costa	342
	4163 Baine Avenue	Fremont	94537	Alameda	132
	301 Avian Drive	Vallejo	94590	Solano	87
	316 West Harvard Boulevard	Santa Paula	93060	Ventura	40
	2400 MacArthur Blvd.	Oakland	94602	Alameda	82
	350 Bird Avenue	San Jose	95126	Santa Clara	123
	419 Timothy Road	Santa Rosa	95407	Sonoma	32
	1945 Zinfandel Avenue	Santa Rosa	95403	Sonoma	128
	2870 Adeline Street	Berkeley	94703	Alameda	91
	11122 Snapdragon Street	Ventura	93004	Ventura	38
	12318 Lamos Place	Moreno Valley	92557	Riverside	40
	1750 Poplar Avenue	Wasco	93280	Kern	64
	2750 Lincoln Street	Oroville	95966	Butte	72
	145 W. Rosecrans Avenue	Compton	90222	Los Angeles	72
	1225 N. Culver Avenue	Compton	90222	Los Angeles	
	70 Esperanza Avenue	Sierra Madre	91024	Los Angeles	46
	9369 Monterey Road	Gilroy	95020	Santa Clara	60
	2 Marina Blvd.	Pittsburg	94565	Contra Costa	200
	49 Goldmine Drive	San Francisco	94131	San Francisco	104
	810 Battery Street	San Francisco	94108	San Francisco	81
	1820 Melrose Drive	San Marcos	92078	San Diego	114
	420 Greenley Road	Sonora	95370	Tuolumne	48
	745 W. 3rd Street	Long Beach	90802	Los Angeles	64
	430 S. Sixth Street	Kerman	93630	Fresno	36
	900 Del Rio Road	Hollister	95023	San Benito	42
	2431 El Segundo Boulevard	Compton	90222	Los Angeles	76
	13500 Tuolumne Street	Parlier	93648	Fresno	106
	2357 N. Beale Road	Marysville	95901	Yuba	88
	809 Diablo Avenue	Novato	94947	Marin	136
	120 W. Adell Street	Madera	93638	Madera	64

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	333 Kalisher St.	San Fernando	91340	Los Angeles	98
	499 Kalisher St.	San Fernando	91340	Los Angeles	
	101 Park Ave.	San Fernando	91340	Los Angeles	
	4400 Central Avenue	Fremont	94536	Alameda	71
	837 East Arrow Highway	Pomona	91767	Los Angeles	32
	13533 Zinnia Hills Place	San Diego	92130	San Diego	108
	5201 Lincoln Avenue	Cypress	90630	Orange	170
	5450 DeMarcus Boulevard	Dublin	94568	Alameda	112
	1411 N. Las Flores Drive	San Marcos	92069	San Diego	100
	200 North McClelland Street	Santa Maria	93454	Santa Barbara	112
	7790 Via Toscana	San Diego	92129	San Diego	123
	755 Xenia Avenue	Beaumont	92223	Riverside	108
	2191 W. Tennyson Road	Hayward	94545	Alameda	252
	2209 Main Street	Santa Monica	90405	Los Angeles	44
	2000 Rubens Way	Oakley	94561	Contra Costa	96
	3510 Maricopa Avenue	Torrance	90503	Los Angeles	180
	6722 Clara Street	Bell Garden	90201	Los Angeles	72
	7145 Old Highway 53	Clearlake	95422	Lake	72
	186 Muir Street	Woodland	95695	Yolo	119
	12612 S. Wilmington Avenue	Compton	90222	Los Angeles	24
	41020 Road 124	Orosi	93647	Tulare	60
	9901 9th Avenue	Hesperia	92345	San Bernardino	21
	315 West Carrillo Street	Santa Barbara	93101	Santa Barbara	62
	170 North Church Road	Earlimart	93219	Tulare	44
	2400 California Avenue	Signal Hill	90755	Los Angeles	60
	12721 Garden Grove Blvd.	Garden Grove	92843	Orange	85
	24115 Cottonwood Avenue	Moreno Valley	92552	Riverside	45
	1531 University Avenue	Berkeley	94703	Alameda	80
	1105 E. Avenue Q4	Palmdale	93550	Los Angeles	48
	511 N. Palmetto	Ontario	91762	San Bernardino	20
	11350 Lee Avenue	Adelanto	92301	San Bernardino	81
	1720 MacArthur Boulevard	Oakland	94602	Alameda	93
	450 N. Foothill Drive	Yreka	96097	Siskiyou	81
	40606 Road 128	Cutler	93615	Tulare	61
	500 12th Street	Greenfield	93927	Monterey	40
	750 Larkspur Lane	Brentwood	94513	Contra Costa	80
	1605 Logan Avenue	San Diego	92113	San Diego	42
	150 Belmont Street	Delano	93215	Kern	70
	5601 Atlantic Blvd.	Maywood	90270	Los Angeles	54
	2029 Cassia Road	San Diego	92009	San Diego	56
	15117 Olympic Drive	Clearlake	95422	Lake	55
	800 Garcia Street	Mendota	93640	Fresno	81
	3702 La Rue Street	Rubidoux	92509	Riverside	92
	3031 Santa Monica Blvd.	Santa Monica	90404	Los Angeles	47
	13414 Community Road	Poway	92064	San Diego	56
	17915 Monterey Road	Morgan Hill	95037	Santa Clara	55
	99 Talisman	Irvine	92620	Orange	150
	10410 Pradera Street	Montclair	91763	San Bernardino	75
	1339 Kingsley Avenue	Stockton	95203	San Joaquin	70
	351 North West Street	Tulare	93274	Tulare	81
	328 S. Harvard Ave.	Lindsay	93247	Tulare	81
	4065 43rd Street	San Diego	92105	San Diego	151
	1150 Brookside Drive	San Pablo	94806	Contra Costa	132
	1555 Tangerine Drive	Orange Cove	93646	Fresno	81
	5135 University Avenue	San Diego	92105	San Diego	69
	66765 Two Bunch Palms Trail	Desert Hot Springs	92240	Riverside	34
	16980 Nisqualli Road	Victorville	92395	San Bernardino	112
	911 East Belgravia Avenue	Fresno	93706	Fresno	92
	871 Turk Street	San Francisco	94109	San Francisco	101
	1750 Cheatham Avenue	Bakersfield	93307	Kern	91
	38780 Orchid View Place	Palmdale	93550	Los Angeles	62
	760 Spruce Lane	Nipomo	93444	San Luis Obispo	40
	820 Kimball Crossing	Red Bluff	96080	Tehama	56
	13111 South San Pedro Street	Los Angeles	90061	Los Angeles	80
	2520 Church Street	Oakland	94605	Alameda	69
	445 18th St	Delano	93215	Kern	70
	22717 Bay Avenue	Moreno Valley	92253	Riverside	61
	16193 H Street	Mojave	93501	Kern	81

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	830 Almond Court	Wasco	93280	Kern	81
	5926 Village Green Drive	Stockton	95210-4625	San Joaquin	40
	3730 Gum Tree Street	Oxnard	93036	Ventura	54
	1101 National Avenue	San Bruno	94066	San Mateo	114
	312 S. Austin Street	Delano	93215	Kern	35
	982 Toomes Avenue	Corning	96021	Tehama	48
	1000 East Avenue Q	Palmdale	93550	Los Angeles	91
	1917 Grande Circle	Fairfield	94533	Solano	52
	1410 J Street	Sanger	93657	Fresno	88
	2600 Corde Terra Circle	San Jose	95111	Santa Clara	300
	151 Canterbury Drive	Aptos	95003	Santa Cruz	39
	1101 National Avenue	San Bruno	94066	San Mateo	114
	901 West First Street	Santa Ana	92703	Orange	199
	1010 Power Avenue	Pittsburg	94565	Contra Costa	224
	1405 South Greenwood Ave.	Montebello	90640	Los Angeles	
	14722 S. Lemoli Ave.	Gardena	90249	Los Angeles	
	1144 East 92nd St.	Los Angeles	90002	Los Angeles	
	22084 Arbor Avenue	Alameda	94541	Alameda	151
	4316 Delta Street	San Diego	92113	San Diego	108
	675 Cantrill Drive	Davis	95618	Yolo	60
	480 City Center Drive	Rohnert Park	94927	Sonoma	56
	1515 Market Street	Oakland	94607	Alameda	196
	1313 E. Vista Chino	Palm Springs	92263	Riverside	80
	1058 South Winchester Blvd.	San Jose	95128	Santa Clara	176
	800 E. Stanley Blvd.	Livermore	94550	Alameda	130
	16016 Babcock Street	San Diego	92127	San Diego	204
	907 Lake Street	San Pablo	94806	Contra Costa	86
	3903 Seven Trees Blvd.	San Jose	95111	Santa Clara	286
	1101 Grant Road	Mountain View	94040	Santa Clara	150
	524 Airport Blvd.	Santa Rosa	95403	Sonoma	56
	15 Salinas Road	Pajaro	95076	Monterey	63
	133 Healdsburg Avenue	Cloverdale	95425	Sonoma	32
	435 East 6th Street	Tracy	95376	San Joaquin	72
	2400 Whitley Avenue	Corcoran	93212	Kings	88
	100 E. Santa Anna Street	Santa Paula	93060	Ventura	24
	1074 South Rowan Avenue	Los Angeles	90023	Los Angeles	25
	601 Sacramento Street	Vallejo	94590	Solano	151
	321 Clementina Street	San Francisco	94103	San Francisco	91
	1001 Franklin Street	San Francisco	94109	San Francisco	121
	2101 Sand Creek Road	Brentwood	94513	Contra Costa	96
	512 Main St	Fillmore	93015	Ventura	50
	420 Berry Street	San Francisco	94158	San Francisco	236
	1804 Hammonton Road	Marysville	95901	Yuba	120
	1020 Stephanie Court	San Marcos	92078	San Diego	72
	9151 Grindlay Street	Cypress	90630	Orange	75
	4805 Clara Street	Cudahy	90201	Los Angeles	50
	111 North Chapel Avenue	Alhambra	91801	Los Angeles	95
	1080 Jennings Ave.	Santa Rosa	95401	Sonoma	107
	16217 Stonebridge Parkway	San Diego	92131	San Diego	106
	6615 Leona Creek Dr	Oakland	94621	Alameda	146
	902 West 12th Street	Tracy	95376	San Joaquin	50
	1500 El Camino Real	Redwood City	94063	San Mateo	58
	35 E. Gish Road	San Jose	95112	Santa Clara	35
	1090 Jennings Avenue	Santa Rosa	95401	Sonoma	70
	622 E. Main Street	Santa Paula	93060	Ventura	41
	43945 12th Street West	Lancaster	93534	Los Angeles	140
	99 Oak Avenue	South San Francisc	94080	San Mateo	43
	1130 F Street	Los Banos	93635	Merced	50
	202 Tapestry Lane	American Canyon	94503	Napa	145
	22701 Davidson Drive	San Joaquin	93660	Fresno	88
	640 Zediker Avenue	Parlier	93648	Fresno	
	1290 Notre Dame Blvd.	Chico	95928	Butte	86
	6230 Haven Avenue	Rancho Cucamong	91737	San Bernardino	117
	1435 North Crawford Avenue	Dinuba	93618	Tulare	81
	45114 Beech Avenue	Lancaster	93534	Los Angeles	72
	1340 Hudson Avenue	San Francisco	94124-2455	San Francisco	130
	4275 Bay Street	Fremont	94538	Alameda	82
	38250 9th Street East	Palmdale	93550	Los Angeles	75

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	4109 Broadmoor Common	Fremont	94538	Alameda	100
	2747 Oliver Drive	Hayward	94545	Alameda	150
	765 Fulton Street	San Francisco	94102	San Francisco	108
	9656 Exeter Ave	Montclair	91763	San Bernardino	100
	1825 Sonoma Blvd.	Vallejo	94590	Solano	136
	2880 Schnell School Rd.	Placerville	95667	El Dorado	48
	817 Newport Avenue	Orland	95963	Glenn	82
	403 Boomerang Drive	Bakersfield	93307	Kern	35
	66555 Fourth St.	Desert Hot Springs	92240	Riverside	156
	66600 Second Desert St.	Desert Hot Springs	92240	Riverside	
	11550 Cholla Dr.	Desert Hot Springs	92240	Riverside	
	33 San Clemente Drive	Corte Madera	94925	Marin	79
	2919 9th Street	Berkeley	94710	Alameda	54
	2155 Corte Vista	Chula Vista	91915	San Diego	150
	301 Cypress Street	Fort Bragg	95437	Mendocino	44
	1030 Post Street	San Francisco	94109	San Francisco	63
	1898 Senter Road	San Jose	95112	Santa Clara	117
	1908 Senter Road	San Jose	95112	Santa Clara	101
	7360 Sterling Avenue	San Bernardino	92410	San Bernardino	80
	1101 East Menlo Avenue	Hemet	92543	Riverside	80
	22627 Grand Terrace Road	Grand Terrace	92313	San Bernardino	120
	1099 Admiral Court	San Bruno	94066	San Mateo	185
	202 I Street	Mendota	93640	Fresno	60
	2040 Stockton Court	Fortuna	95540	Humboldt	24
	3110 Boyd Road	Arcata	95521	Humboldt	36
	51 Brannan Mountain Road	Willow Creek	95573	Humboldt	24
	160 14th Street	Oakland	94612	Alameda	79
	2570 Fontaine Road	San Jose	95121	Santa Clara	180
	3085 South Higuera Street	San Luis Obispo	93401	San Luis Obispo	28
	1535 E. Plaza Blvd.	National City	91950	San Diego	80
	272 East Lake St.	Weed	96094	Siskiyou	61
	424 South E. Street	Porterville	93257	Tulare	64
	2300 Highway 273	Anderson	96007	Shasta	80
	635 S. Elwood Ave.	Glendora	91740	Los Angeles	87
	548 East Honolulu Street	Lindsay	93247	Tulare	43
	471 West College Avenue	Santa Rosa	95401	Sonoma	99
	990 Polk Street	San Francisco	94109	San Francisco	110
	500 Alpine St.	Avenal	93204	Kings	81
	808 North Main Street	Salinas	93906	Monterey	124
	712 I Street	Antioch	94531	Contra Costa	40
	617 Garden Street	Santa Barbara	93101	Santa Barbara	51
	81 Mihalakis Street	Milpitas	95035	Santa Clara	101
	2502 Hanna Avenue	Corcoran	93212	Kings	56
	730 San Pedro Way	Soledad	93960	Monterey	84
	319 S. Jackson Street	Red Bluff	96080	Tehama	61
	2111 Williams Street	Long Beach	90810	Los Angeles	81
	2245 Tapo Street	Simi Valley	93063	Ventura	36
	2719 Foothill Boulevard	Oakland	94601	Alameda	65
	568 C Street	Hayward	94541	Alameda	60
	50 Sierra Vista Ave.	Mountain View	94043	Santa Clara	104
	1692 South Santa Fe Avenue	San Jacinto	92583	Riverside	81
	1034 E. Chapel Street	Santa Maria	93454	Santa Barbara	24
	5315 Carrington Circle	Stockton	95210	San Joaquin	21
	2398 East 14th Street	San Leandro	94577	Alameda	68
	112 Brewer Street	Templeton	93465	San Luis Obispo	43
	15097 Olympic Drive	Clearlake	95422	Lake	54
	5553 Alicia Ave.	Marysville	95901	Yuba	73
	195 E. Carson Street	Colusa	95932	Colusa	81
	350 Westpark Court	Camarillo	93012	Ventura	34
	12960 Perris Boulevard	Moreno Valley	92553	Riverside	189
	1601 Lotus Lane	Bakersfield	93307	Kern	73
	236 West Harvard Boulevard	Santa Paula	93060	Ventura	35
	3693 Florida Street	San Diego	92104	San Diego	71
	2903 Pioneer Drive	Bakersfield	93306	Kern	81
	610 La Roda Drive	Camarillo	93011	Ventura	13
	1515 E. Jensen Avenue	Fresno	93706	Fresno	69
	250 W. 15th Ave	Escondido	92025	San Diego	80
	38040 27th Street East	Palmdale	93550	Los Angeles	81

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	1548 5th Street	Santa Monica	90401	Los Angeles	46
	1737 West Holt Avenue	Pomona	91768	Los Angeles	90
	530 Elm Avenue	Long Beach	90802	Los Angeles	17
	340 South Downs Street	Ridgecrest	93555	Kern	81
	455 E Ash Ave	Shafter	93263	Kern	81
	3975 Seven Trees Blvd.	San Jose	95128	Santa Clara	288
	320 Grand Boulevard	Corona	92882	Riverside	75
	125 East 10th Street	Pittsburg	94565	Contra Costa	28
	2700 East Ponderosa Drive	Camarillo	93010	Ventura	305
	745 Alamos Ave.	Long Beach	90813	Los Angeles	321
	53 E. Carmel Valley Road	Carmel Valley Villa	93924	Monterey	79
	16599 Muscatel Street	Hesperia	92345	San Bernardino	110
	1411 N. Durant Street	Santa Ana	92706	Orange	49
	1501 N. Ross Street	Santa Ana	92706	Orange	
	530 W Jackman Ave.	Lancaster	93534	Los Angeles	100
	1220 Olive Drive	Davis	95616	Yolo	53
	451 Sutter Hill Road	Sutter Creek	95685	Amador	44
	7270 Calle Plata	Carlsbad	92009	San Diego	168
	230 Turk Street	San Francisco	94102	San Francisco	113
	2946 International Boulevard	Oakland	94601	Alameda	36
	14200 Rodeo Drive	Victorville	92392	San Bernardino	99
	3232 Mission Avenue	Oceanside	92054	San Diego	80
	1515 N. Orange Avenue	La Puente	91744	Los Angeles	53
	1045 E. Condor Street	Crescent City	95531	Del Norte	56
	1085 Highway 101 North	Crescent City	95531	Del Norte	38
	3200 East Baristo Road	Palm Springs	92262	Riverside	116
	123 S. Catalina Avenue	Redondo Beach	90277	Los Angeles	136
	439 Benito Street	Soledad	93960	Monterey	73
	2121 7th Street	Berkeley	94710	Alameda	47
	1432 Willow Avenue	Rialto	92376	San Bernardino	152
	4962 N. Third Street	Biola	93606	Fresno	44
	804 S. Harris Street	Hanford	93230	Kings	40
	351 Danielle Way	Woodlake	93286	Tulare	24
	1620 Miekle Avenue	Woodland	95695	Yolo	156
	163 North Main Street	Milpitas	95035	Santa Clara	103
	100 Parkhurst Circle	Aptos	95003	Santa Cruz	68
	2411 Centinela Avenue	Santa Monica	90405	Los Angeles	36
	21 East Anapamu Street	Santa Barbara	93101	Santa Barbara	12
	101 Enterprise Drive	Rohnert Park	94928	Sonoma	171
	8768 Jamacha Road	Spring Valley	91977	San Diego	136
	928 66th Avenue	Oakland	94621	Alameda	106
	1315 Eden Avenue	San Jose	95117	Santa Clara	143
	9901 9th Avenue	Hesperia	92345	San Bernardino	68
	110 East Baker Street	Winters	95694	Yolo	34
	238 Blume Street	Nipomo	93444	San Luis Obispo	120
	10 Edgewater Place	Larkspur	94939	Marin	28
	3606 Del Sol Blvd.	San Diego	92154	San Diego	93
	9055 Foothill Boulevard	Rancho Cucamong	91730	San Bernardino	230
	655 Alabama Street	San Francisco	94110	San Francisco	24
	312 Lupin St.	Mammoth Lakes	93546	Mono	31
	3477 Main St.	Mammoth Lakes	93546	Mono	
	44 Manzanita Rd.	Mammoth Lakes	93546	Mono	
	2949 18th Street	San Francisco	94110	San Francisco	93
	655 Pacific Avenue	Crescent City	95531	Del Norte	50
	1350 Lexington Avenue	San Jose	95117	Santa Clara	80
	1801 North Alex	Los Angeles	90015	Los Angeles	
	8632 C Avenue	Hesperia	92345	San Bernardino	72
	1236 Fernot Way	Hanford	93230	Kings	100
	1515 Geary Road	Walnut Creek	94597	Contra Costa	70
	2891 Carmen Avenue	Livermore	94550	Alameda	30
	2600 Red Bud Lane	Anderson	96007	Shasta	100
	2425 Shady Lane	Anderson	96007	Shasta	
	1565 Fair Oaks Drive	Anderson	96007	Shasta	
	22842 Vermont Street	Hayward	94541	Alameda	109
	2175 Kittredge St	Berkeley	94704	Alameda	97
	1475 Imperial Ave	San Diego	92101	San Diego	275
	820 Jennings Avenue	Santa Rosa	95401	Sonoma	49
	578 Orange Avenue	Coronado	92118	San Diego	30

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	202 Railroad Avenue	Suisun City	94585	Solano	94
	1600 Lakeshore Avenue	Oakland	94606	Alameda	143
	16450 Kent Avenue	San Lorenzo	94580	Alameda	84
	684 Ellis Street	San Francisco	94109	San Francisco	84
	324 Willow Street	Bishop	93514	Inyo	12
	2333 Pillsbury Road	Chico	95926	Butte	76
	2031 Orange Avenue	Costa Mesa	92627	Orange	36
	381 N. Eucalyptus	Blythe	92225	Riverside	100
	200 N. Lovekin Bl.	Blythe	92225	Riverside	
	333 North "F"" Street"	Oxnard	93030	Ventura	228
	900 4th Street	Bakersfield	93304	Kern	79
	5 Commer Court	San Francisco	94124	San Francisco	146
	65 Navy Road	San Francisco	94124	San Francisco	157
	3929 East First Street	Los Angeles	90063	Los Angeles	85
	1324 Santee Drive	San Jose	95122	Santa Clara	192
	1401 North Ln	Hayward	94545	Alameda	78
	53 Carol Lane	Oakley	94561	Contra Costa	208
	44958 N. 10th Street West	Lancaster	93534	Los Angeles	84
	300 Central Avenue	Wasco	93280	Kern	42
	3836 Alabama Street	San Diego	92104	San Diego	67
	1327 Lincoln Avenue	San Rafael	94901	Marin	66
	21100 State Highway 33	Dos Palos	93620	Merced	80
	Meredith Avenue	Gustine	93622	Merced	
	115 Shoreline Highway	Mill Valley	94941	Marin	50
	14779 Seneca Road	Victorville	92392	San Bernardino	203
	1550 Market Street	San Diego	92101	San Diego	136
	640 16th Street	San Diego	92101	San Diego	
	1250 Foxdale Loop	San Jose	95122	Santa Clara	287
	3429 Evergreen Circle	West Sacramento	95691	Yolo	296
	30 Whitfield Court	San Francisco	94124	San Francisco	145
	35 Lillian Street	San Francisco	94124	San Francisco	156
	44916 N 10th Street West	Lancaster	93534	Los Angeles	150
	1921 Pock Lane	Stockton	95205	San Joaquin	65
	8500 Bella Vista Street	Parlier	93648	Fresno	47
	875 E. Terra Bella Avenue	Pixley	93256	Tulare	55
	750 Grande Street	Nipomo	93444	San Luis Obispo	52
	1755 Logan Ave	San Diego	92113	San Diego	85
	305 San Antonio Court	San Jose	95116	Santa Clara	86
	2147 S. Maple St.	Fresno	93725	Fresno	80
	36400 Giffen Drive	Huron	93234	Fresno	81
	350 MacDonald Avenue	Richmond	94801	Contra Costa	66
	65 Carol Lane	Oakley	94561	Contra Costa	54
	1830 S. Dairy Avenue	Corcoran	93212	Kings	69
	328 S. Harvard Avenue	Lindsay	93247	Tulare	40
	565 Petaluma Avenue	Sebastopol	95472	Sonoma	45
	9541 W. Ball Road	Anaheim	92804	Orange	49
	1333 Monterey Street	Soledad	93960	Monterey	52
	2750 Gilmore Lane	Oroville	95966	Butte	72
	9023 Camino La Jolla	Lamont	93241	Kern	44
	2300 R Street	Bakersfield	93301	Kern	60
	170 S. Garden St.	Ventura	93001	Ventura	69
	36 W. Thompson Blvd.	Ventura	93001	Ventura	
	175 S. Ventura Ave.	Ventura	93001	Ventura	
	550 Fanoe Road	Gonzales	93926	Monterey	44
	1501 Broadway	Chula Vista	91911	San Diego	42
	44 McAllister Street	San Francisco	94102	San Francisco	212
	401 West Columbus Avenue	Bakersfield	93301	Kern	66
	989 Brush Street	Oakland	94607	Alameda	61
	9055 Santa Fe Avenue East	Hesperia	92345	San Bernardino	65
	612 E. 17th Street	Marysville	95901	Yuba	68
	2774 Monterey Highway	San Jose	95111	Santa Clara	72
	2774 Summer Lane	Crescent City	95531	Del Norte	81
	2187 S. Maple Avenue	Fresno	93725	Fresno	74
	4672 Plumosa Drive	Yorba Linda	92886	Orange	76
	7385 Broadway	Lemon Grove	91945	San Diego	36
	1567 7th Avenue	Olivehurst	95961	Yuba	61
	38530 Tierra Subida Avenue	Palmdale	93551	Los Angeles	80
	555 98th Avenue	Oakland	94603	Alameda	58

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	1629 National Avenue	San Diego	92113	San Diego	89
	27271 Paseo Espada	San Juan Capistran	92675	Orange	38
	67 Carol Lane	Oakley	94561	Contra Costa	54
	702 W. Sierra Avenue	Woodlake	93286	Tulare	68
	200 N. Stevens Avenue	Farmersville	93223	Tulare	48
	1332 Rosamond Blvd.	Rosamond	93560	Kern	81
	66 Ninth Street	San Francisco	94103	San Francisco	107
	1390 Mission Street	San Francisco	94103	San Francisco	136
	650 Eddy Street	San Francisco	94109	San Francisco	83
	750 Dorothy Adamo Lane	West Sacramento	95605	Yolo	120
	500 William Street	Oakland	94612	Alameda	665
	1710 Maxson Street	Oceanside	92054	San Diego	36
	1415 E. Lexington Ave.	El Cajon	92019	San Diego	144
	1949 Los Feliz Drive	Thousand Oaks	91362	Ventura	148
	3101 Coventry Drive	Bakersfield	93304	Kern	88
	1201 E. Wilshire Avenue	Santa Ana	92707	Orange	144
	1401 S. Minnie Street	Santa Ana	92707	Orange	
	2701 Creek Park Lane	Santa Rosa	95407	Sonoma	84
	705 Rohnert Park Expressway	Rohnert Park	94928	Sonoma	24
	615 W. Hawthorne Street	Eureka	95503	Humboldt	50
	1112 E Street	Eureka	95503	Humboldt	
	735 P Street	Eureka	95503	Humboldt	
	2853 Kelvin Avenue	Irvine	92614	Orange	71
	115 N. 4th Street	Santa Paula	93060	Ventura	150
	202 Table Mountain Road	Oroville	95965	Butte	88
	5004 Hartnett Ave.	Richmond	94804	Contra Costa	378
	525 South Ninth Street	San Jose	95112	Santa Clara	60
	21424 South Marks	Riverdale	93656	Fresno	172
	1391 East Sumner	Fowler	93625	Fresno	
	2026 Barbara Drive	Selma	93662	Fresno	
	2543 Nelson Blvd.	Selma	93662	Fresno	
	45 N. Salisbury	Porterville	93257	Tulare	250
	65 N. Salisbury	Porterville	93257	Tulare	
	1101 S. Irwin	Tulare	93274	Tulare	
	551 N. Cypress	Woodlake	93286	Tulare	
	555 19th Street	Oakland	94612	Alameda	80
	2597 S. Richelle Avenue	Fresno	93725	Fresno	65
	1030 River Street	Santa Cruz	95060	Santa Cruz	100
	2200 Sycamore Drive	Antioch	94509	Contra Costa	136
	240 Ocean Oaks Lane	Avila Beach	93424	San Luis Obispo	29
	281 Riverpark Blvd	Oxnard	93036	Ventura	86
	289 Riverpark Blvd	Oxnard	93036	Ventura	54
	400 Casa Grande Road	Petaluma	94954	Sonoma	58
	2665 Clark Avenue	Norco	92860	Riverside	86
	1801 14th Street	Oakland	94607	Alameda	99
	108 P Street	Madera	93637	Madera	76
	18800 Beatrice Drive	Sonoma	95476	Sonoma	35
	3060 53rd Street	San Diego	92105	San Diego	92
	250 Toomes Avenue	Corning	96201	Tehama	48
	3604 Beyer Blvd.	San Ysidro	92173	San Diego	398
	1531 Adalaide	Concord	94520	Contra Costa	139
	1601 Pine Street	Concord	94520	Contra Costa	
	2020 Southwest Expressway	San Jose	95126	Santa Clara	130
	4201 Racetrack Road	Rocklin	95677	Placer	32
	125 Mason Street	San Francisco	94102	San Francisco	81
	951 Torrano Avenue	Hayward	94542	Alameda	81
	1720 South Depot Street	Santa Maria	93458	Santa Barbara	236
	1423 Reasor Road	McKinleyville	95519	Humboldt	50
	16525 South 11th Street	Huron	93234	Fresno	64
	200 E. Sierra Avenue	Woodlake	93286	Tulare	44
	2235 Gilbert Gonzales Jr. Drive	Los Banos	93635	Merced	105
	1 Drake's Way	Larkspur	94939	Marin	24
	662 East Street	Tracy	95376	San Joaquin	88
	24845 Fort Crook Avenue	Fall River Mills	96028	Shasta	38
	850 Descanso Place	Bakersfield	93306	Kern	54
	439 Benito Street	Soledad	93960	Monterey	70
	275 10th Street	San Francisco	94103	San Francisco	135
	350 W. Imperial Highway	Brea	92821	Orange	92

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	2122 Burdock Way	Chula Vista	91915	San Diego	92
	3555 Glen Ave	Carlsbad	92010	San Diego	78
	6682 Picasso Road	Isla Vista	93117	Santa Barbara	20
	4333 Dawson Avenue	San Diego	92115	San Diego	64
	5862 Bagley Avenue	Twentynine Palms	92277	San Bernardino	48
	701 Curtner Avenue	San Jose	95125	Santa Clara	179
	555 Oxford Street	Chula Vista	91911	San Diego	132
	3838 Clayton Road	Concord	94521	Contra Costa	75
	515 13th Street	San Diego	92101	San Diego	77
	525 Orange Avenue	Coronado	92118	San Diego	16
	3137 El Cajon Boulevard	San Diego	92104	San Diego	24
	2555 East Leland Road	Pittsburg	94565	Contra Costa	63
	8837 Grove Avenue	Rancho Cucamong	91730	San Bernardino	40
	1629 Lotus	Bakersfield	93307	Kern	80
	4707 Kentfield Road	Stockton	95207	San Joaquin	45
	4888 Logan Avenue	San Diego	92113	San Diego	268
	1930 Almaden Road	San Jose	95125	Santa Clara	152
	3040 David Avenue	San Jose	95128	Santa Clara	65
	9705 El Camino Real	San Luis Obispo	93422	San Luis Obispo	19
	2555 Corde Terra Circle	San Jose	95111	Santa Clara	201
	675 South Farmersville Blvd.	Farmersville	93223	Tulare	48
	1616 Old Mammoth Road	Mammoth Lakes	93546	Mono	48
	300 Regal Avenue	Irvine	92620	Orange	90
	9055 Santa Fe Avenue East	Hesperia	92345	San Bernardino	58
	104 Averil Road	San Ysidro	92173	San Diego	45
	15729 S. Atlantic Avenue	East Rancho Domii	90221	Los Angeles	70
	227-255 7th Street	San Francisco	94103	San Francisco	49
	4321 52nd Street	San Diego	92115	San Diego	88
	38235 10th Street East	Palmdale	93550	Los Angeles	78
	200 N. Steven Avenue	Farmersville	93223	Tulare	16
	5127 Creely Avenue	Richmond	94804	Contra Costa	36
	1626 Hillsdale Avenue	San Jose	95124	Santa Clara	48
	400 Harbour Way	Richmond	94801	Contra Costa	36
	1150 Tammy Lane	Lemoore	93245	Kings	57
	13549 Wood St	Madera	93638	Madera	48
	280 N. Lemon Ave	Ontario	91764	San Bernardino	76
	16999 Orange Way	Fontana	92335	San Bernardino	90
	2355 Long Beach Boulevard	Long Beach	90806	Los Angeles	46
	130 13th Street	Greenfield	93927	Monterey	40
	251 Autumn Drive	San Marcos	92069	San Diego	103
	12222 Garfield Avenue	South Gate	90280	Los Angeles	101
	508 North Montgomery Stree	Ojai	93023	Ventura	21
	14606 W. Kearney Blvd.	Kerman	93630	Fresno	20
	2119 W Capitol Avenue	West Sacramento	95691	Yolo	62
	2901 S. El Camino Real	San Mateo	94403	San Mateo	68
	7000 Di Giorgio Road	Lamont	93241	Kern	80
	1050 B Street	San Diego	92101	San Diego	111
	220 5th St.	West Sacramento	95605	Yolo	45
	200 4th St.	West Sacramento	95605	Yolo	
	511 B St.	West Sacramento	95605	Yolo	
	35 West Clover Street	Woodland	95695	Yolo	68
	1050 B Street	San Diego	92101	San Diego	118
	98 East Jarvis Street	Perris	92571	Riverside	
	400 N. Palm Drive	Blythe	92225	Riverside	70
	22328 South Garden Avenue	Hayward	94541	Alameda	66
	9914 99th Avenue Court	Oakland	94603	Alameda	72
	149 Mason Street	San Francisco	94102	San Francisco	56
	40 Brannan St.	Calistoga	94515	Napa	24
	201 Country Club Lane	Oceanside	92054	San Diego	90
	1200 Ranchero Way	San Jose	95117	Santa Clara	94
	1060 Sierra Bonita Ave.	West Hollywood	90046	Los Angeles	42
	1447 Herbert Ave.	South Lake Tahoe	96150	El Dorado	33
	2051 W. Steele Lane	Santa Rosa	95403	Sonoma	62
	920 East Mission Ave.	Fallbrook	92028	San Diego	80
	1825 South Santa Fe Ave.	San Jacinto	92583	Riverside	55
	435 Alturas Rd.	Fallbrook	92028	San Diego	44
	4545 Kentfield Rd.	Stockton	95207	San Joaquin	90
	10355 Mills Ave.	Montclair	91763	San Bernardino	85

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	171 Palomar St.	Chula Vista	91911	San Diego	168
	3800 Old HWY 53	Clearlake	95422	Lake	91
	15160 Austin Dr.	Clearlake	95422	Lake	
	811 W. California Ave.	Fresno	93706	Fresno	69
	8 Reardon Rd.	San Francisco	94124	San Francisco	82
	236 Main Street	Fillmore	93015	Ventura	21
	624 12th Street	Imperial Beach	91932	San Diego	15
	1720 MacArthur Blvd.	Oakland	94602	Alameda	81
	2400 Fair Dr.	Napa	94558	Napa	355
	2435 Sutherland Dr.	Napa	94558	Napa	
	2200 Delaware St.	Huntington Beach	92648	Orange	48
	400 West Rincon Avenue	Campbell	95008	Santa Clara	200
	8989 Mission Blvd.	Riverside	92509	Riverside	102
	370 F Street	Colma	94014	San Mateo	119
	3575 Geary Blvd.	San Francisco	94118	San Francisco	150
	5600 Third St.	San Francisco	94124	San Francisco	116
	7022 Di Giorgio Road	Lamont	93241	Kern	64
	200 Dorsey Dr.	Grass Valley	95945	Nevada	121
	3655 Sunset Blvd.	Rocklin	95677	Placer	104
	850 Broderick St.	San Francisco	94115	San Francisco	47
	201 W Regent Street	Inglewood	90301	Los Angeles	107
	1 South Locust Street	Inglewood	90301	Los Angeles	199
	10220 Foothill Boulevard	Rancho Cucamong	91730	San Bernardino	166
	750 Bay Avenue	Capitola	95010	Santa Cruz	109
	90 Grandview Street	Santa Cruz	95060	Santa Cruz	50
	12509 Oak Knoll Rd.	Poway	92064	San Diego	52
	930 84th Ave	Oakland	94621	Alameda	137
	11410 Santa Gertrudes Ave.	Whittier	90604	Los Angeles	89
	11620 Cherrylee Dr.	El Monte	91732	Los Angeles	78
	200 Drake St.	Pomona	91767	Los Angeles	109
	1025 S. Kern Ave.	Los Angeles	90022	Los Angeles	75
	20644 E. Arrow Highway	Covina	91724	Los Angeles	64
	1924 Church Lane	San Pablo	94806	Contra Costa	54
	2000-2070 Crestview Dr	Pittsburg	94565	Contra Costa	71
	488 East 15th Street	Beaumont	92223	Riverside	80
	10777 Poplar Street	Loma Linda	92354	San Bernardino	44
	44927 Date Avenue	Lancaster	93534	Los Angeles	40
	1464 Montecito Road	Ramona	92065	San Diego	70
	8810 C Avenue	Hesperia	92345	San Bernardino	154
	1444 Segsworth Way	Grass Valley	95945	Nevada	48
	2103 East 14th Street	San Leandro	94577	Alameda	51
	7550 Desert Holly Street	Chino	91708	San Bernardino	250
	1300 Kentwood Lane	San Leandro	94578	Alameda	142
	4707 Yuma Ave	Oceanside	92057	San Diego	144
	1101 Union Ave.	Fairfield	94533	Solano	84
	711 University Avenue	Rocklin	95677	Placer	156
	1615 Sutter Street	San Francisco	94109	San Francisco	245
	1120 North Lemon Street	Orange	92867	Orange	57
	10050 Juniper Avenue	Fontana	92335	San Bernardino	50
	2740 Dutton Meadows	Santa Rosa	95407	Sonoma	52
	17690 McLaughlin Ave.	Morgan Hill	95037	Santa Clara	49
	3774 Beyer Boulevard	San Ysidro	92173	San Diego	80
	2674 E. Clinton Ave.	Fresno	93703	Fresno	215
	13839 Lyn Street	Armona	93202	Kings	20
	430 B Street	Fresno	93706	Fresno	50
	2150 S. Elm Street	Fresno	93706	Fresno	
	660 South Fair Oaks	Sunnyvale	94086	Santa Clara	124
	851 North 10th Street	San Jose	95112	Santa Clara	53
	34290 Corregidoe Drive	Cathedral City	92234	Riverside	60
	4914 Logan Avenue	San Diego	92113	San Diego	112
	2201 Emily Street	San Luis Obispo	93401	San Luis Obispo	42
	1150 N. Ventura Avenue	Ventura	93001	Ventura	12
	280 Hospital Circle	Westminster	92683	Orange	36
	735 Mission Grove Place	Escondido	92025	San Diego	55
	96 Shasta Court	Chowchilla	93610	Madera	72
	215 E. Washington Ave	Escondido	92025	San Diego	61
	108 E. Park Street	Hollister	95023	San Benito	72
	131 W. Putnam Avenue	Porterville	93257	Tulare	70

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	1030 Kendrea Ave.	McFarland	93250	Kern	80
	823 Farmersville Blvd.	Farmersville	93223	Tulare	40
	773 Knickerbocker Rd	Big Bear Lake	92315	San Bernardino	42
	2125 Gilbert Gonzalez Jr. Drive	Los Banos	93635	Merced	80
	10319 Mills Avenue	Montclair	91763	San Bernardino	50
	812 S. Osage Apartments	Inglewood	90301	Los Angeles	20
	4803 El Canon Avenue	Calabasas	91302	Los Angeles	75
	15810 S. Frailey Ave.	Compton	90221	Los Angeles	84
	10 Toussin Avenue	Kentfield	94904	Marin	13
	422 E. Cota Street	Santa Barbara	93101	Santa Barbara	56
	5555 Crestridge Road	Rancho Palos Verd	90275	Los Angeles	34
	12572 Morningside Ave.	Garden Grove	92843	Orange	104
	12622 Keel Ave.	Garden Grove	92843	Orange	
	71 Carol Lane	Oakley	94561	Contra Costa	44
	365 Fulton Street	San Francisco	94102	San Francisco	120
	751 Driskell Avenue	Newman	95360	Stanislaus	68
	1194 Hollister Street	San Diego	92154	San Diego	50
	531 East Market Street	Salinas	93905	Monterey	23
	955 Railroad Avenue	Winters	95694	Yolo	74
	1047 Rosamond Boulevard	Rosamond	93560	Kern	73
	1041 Buckhorn Drive	Salinas	93905	Monterey	81
	1458 14th Street	Santa Monica	90404	Los Angeles	20
	665 West Lancaster Blvd.	Lancaster	93534	Los Angeles	21
	161 Turk Street	San Francisco	94102	San Francisco	82
	249 Eddy Street	San Francisco	94102	San Francisco	
	601 E. Main Street	Stockton	95202	San Joaquin	91
	44826 Fig Avenue	Lancaster	93534	Los Angeles	21
	1410 Hood Street	Arvin	93202	Kern	51
	16193 H Street	Mojave	93501	Kern	81
	187 N. Westwood Ave.	Lindsay	93247	Tulare	73
	2400 Shady Lane	Anderson	96007	Shasta	79
	351 N. West Street	Tulare	92374	Tulare	72
	1027 Redondo Ave.	Long Beach	90804	Los Angeles	46
	1134 Stanley Ave.	Long Beach	90804	Los Angeles	
	350 E. Esther St.	Long Beach	90804	Los Angeles	
	707 Milling Street	Lancaster	93534	Los Angeles	40
	774 N. Grant Ave.	Manteca	95336	San Joaquin	52
	199 East Inger Drive	Santa Maria	93454	Santa Barbara	47
	1620 6th Avenue	San Diego	92101	San Diego	65
	1816 Lotus Lane	Bakersfield	93307	Kern	65
	430 20th Avenue	Delano	93215	Kern	70
	2740 Dutton Meadow	Santa Rosa	95407	Sonoma	97
	731 South 11th Avenue	Hanford	93230	Kings	49
	701 Union Avenue	Bakersfield	93307	Kern	56
	725 S. Hindry Avenue	Inglewood	90301	Los Angeles	196
	675 Copello Drive	Angels Camp	95222	Calaveras	50
	2320 Stillman Street	Selma	93662	Fresno	81
	745 Paigewood Drive	Orland	95963	Glenn	73
	600 N. Euclid Avenue	Dinuba	93618	Tulare	57
	200 N. Mill Street	Tehachapi	93561	Kern	81
	5086 Chestnut Avenue	Olivehurst	95961	Yuba	51
	708 E. Carson Street	Carson	90745	Los Angeles	86
	2090 Heritage Parkway	Woodland	95776	Yolo	43
	2601 Valencia Ave.	Brea	92821	Orange	94
	2647 International Boulevard	Oakland	94601	Alameda	84
	20503 San Ramon Valley Blvd	San Ramon	94583	Contra Costa	105
	1650 First Street	Lincoln	95648	Placer	49
	411 South Stanislaus Street	Stockton	95202	San Joaquin	93
	1001 83rd Avenue	Oakland	94621	Alameda	20
	555 Rosa Parks Road	Palm Springs	92262	Riverside	57
	1460 N 4th Street	San Jose	95112	Santa Clara	100
	401 Fairmount Avenue	Oakland	94611	Alameda	31
	1855 Cheatham Avenue	Bakersfield	93307	Kern	45
	170 Wright Avenue	Morgan Hill	95037	Santa Clara	24
	5471 Bayview Heights Place	San Diego	92105	San Diego	300
	100 Civic Drive	Hercules	94547	Contra Costa	60
	2700 Tuolumne Street	Vallejo	94590	Solano	76
	88 DeWitt	Clovis	93612	Fresno	101

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	1805 South Escondido Blvd.	Escondido	92025	San Diego	24
	13120 Pomerado Road	Poway	92064	San Diego	102
	225 W. Fruitvale Ave.	Hemet	92543	Riverside	71
	518 East Canon Perdido	Santa Barbara	93101	Santa Barbara	7
	1116 De La Vina Street	Santa Barbara	93101	Santa Barbara	98
	864 Ellis Street	San Francisco	94102	San Francisco	25
	9119 Jamacha Road	Spring Valley	91977	San Diego	116
	3810 Winona Avenue	San Diego	92105	San Diego	68
	8133 Third Street	Downey	90241	Los Angeles	31
	1212 Detroit Street	West Hollywood	90046	Los Angeles	10
	225 Washington Blvd.	Chowchilla	93610	Madera	57
	1005 Peterson Ranch Road	Templeton	93456	San Luis Obispo	29
	98 Raemer	Camarillo	93010	Ventura	10
	2061 Daily Dr.	Camarillo	93010	Ventura	
	2047 Mobil	Camarillo	93010	Ventura	
	2370 Barry St.	Camarillo	93010	Ventura	
	255 Fulton St.	Camarillo	93010	Ventura	
	288 Addington Way	Boronda	93907	Monterey	2
	1136 Fontes Lane	Boronda	93907	Monterey	
	8700 Sabino Drive	Castroville	95012	Monterey	30
	177 West South Street	Rialto	92376	San Bernardino	100
	8811 Vista De Tierra Circle	Castroville	95012	Monterey	60
	708 Pico Blvd.	Santa Monica	90405	Los Angeles	20
	101 A Street	Colma	94014	San Mateo	74
	670 Natoma Street	San Francisco	94103	San Francisco	48
	853 William Street	Pomona	91768	Los Angeles	31
	3955 Vistapark Drive	San Jose	95136	Santa Clara	83
	44 Stewart Avenue	Freedom	95019	Santa Cruz	76
	130 Ciolino Ave.	Morgan Hill	95037	Santa Clara	42
	2151 Stony Point Road	Santa Rosa	95407	Sonoma	40
	680 South 37th Street	Richmond	94804	Contra Costa	324
	7035 Greenleaf Avenue	Whittier	90602	Los Angeles	50
	295 San Andreas Road	Watsonville	95076	Santa Cruz	43
	1500 Almaden Expressway	San Jose	95125	Santa Clara	148
	1601 Market Street	Oakland	94607	Alameda	77
	2 Sandy Lane	Petaluma	94952	Sonoma	87
	1300 Buchanan Street	San Francisco	94102	San Francisco	193
	548 Second Street West	Sonoma	95476	Sonoma	30
	2001 Miramontes Point Road	Half Moon Bay	94019	San Mateo	80
	101 Civic Center Drive	Scotts Valley	95066	Santa Cruz	46
	9902 Broadway	Live Oak	95953	Sutter	14
	500 P Street	Firebaugh	93622	Fresno	48
	240 N. El Camino	San Mateo	94401	San Mateo	44
	6600 International Blvd.	Oakland	94621	Alameda	30
	1363 Pismo Street	San Luis Obispo	93401	San Luis Obispo	11
	2001 River Avenue	Long Beach	90810	Los Angeles	196
	5203 Live Oak Street	Cudahy	90201	Los Angeles	40
	9537 Kelley	Stockton	95209	San Joaquin	19
	5343 Carrington Circle	Stockton	95210	San Joaquin	59
	400 A Cisco	Ridgecrest	93555	Kern	80
	36850 Lassen Avenue	Huron	93234	Fresno	40
	4672 Melody Drive	Concord	94521	Contra Costa	148
	511 East Grand Avenue	Escondido	92025	San Diego	112
	2250 R Street	Bakersfield	93301	Kern	80
	309 Beacon Street	Avalon	90704	Los Angeles	38
	224 E. Commonwealth Avenue	Fullerton	92831	Orange	137
	1260 Piedmont Road	San Jose	95132	Santa Clara	96
	2418 E. El Segundo Blvd.	Los Angeles	90222	Los Angeles	21
	16480 Del Monte Avenue	Morgan Hill	95037	Santa Clara	112
	987 Fair Avenue	San Jose	95122	Santa Clara	69
	11155 Citrus Drive	Ventura	93004	Ventura	81
	1056 Weldon Lane	Bay Point	94565	Contra Costa	120
	430 West Alpine Street	Upland	91786	San Bernardino	137
	570 Imperial Highway	Fullerton	92835	Orange	204
	4085 Fruit Avenue	Fresno	93705	Fresno	365
	2301 Sycamore Drive	Antioch	94509	Contra Costa	186
	1000 Claudia Court	Antioch	94509	Contra Costa	129
	1265 Monument Blvd.	Concord	94520	Contra Costa	198

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	1551 Saturn Boulevard	San Diego	92154	San Diego	248
	555 Alaska Avenue	Fairfield	94533	Solano	129
	1839 and 1849 Nelson Blvd.	Selma	93662	Fresno	193
	909 Leslie Road	El Cajon	92020	San Diego	41
	1545 Q Avenue	National City	91790	San Diego	132
	700 Kincheloe Court	Woodland	95695	Yolo	173
	32325 South Pasadena Street	Wildomar	92595	Riverside	176
	1101 Burton Drive	Vacaville	95687	Solano	108
	521 Pioneer Avenue	Woodland	95695	Yolo	136
	485 Holohan Road	Watsonville	95076	Santa Cruz	82
	460 East Washington Avenue	Escondido	92026	San Diego	91
	849B Paula Street	San Jose	95126	Santa Clara	47
	3550 Villa Lane	Napa	94558	Napa	102
	5150 Monterey Road	San Jose	95111	Santa Clara	286
	2095 West Spring Street	Long Beach	90810	Los Angeles	410
	4531 Logan Avenue	San Diego	92113	San Diego	166
	5300 Terner Way	San Jose	95136	Santa Clara	194
	1201 Medical Center Drive	chula Vista	91910	San Diego	132
	2550 South King Road	San Jose	95122	santa Clara	272
	520 N. Sixth Street	San Jose	95112	Santa Clara	109
	3915 Delta Fair Boulevard	Antioch	94509	Contra Costa	205
	27700 Landau Blvd.	Cathedral City	92234	Riverside	241
	950 Nantucket Blvd.	Salinas	93906	Monterey	160
	201 Sammy Way	Rocklin	95765	Placer	112
	2230 S. Eastern Avenue	Commerce	90040	Los Angeles	94
	1401 Townview Avenue	Santa Rosa	95405	Sonoma	189
	1977 Tate Street	East Palo Alto	94303	San Mateo	129
	2820 Papago Court	Santa Rosa	95403	Sonoma	48
	2852 Apple Valley Lane	Santa Rosa	95403	Sonoma	
	10122 Buena Vista Avenue	Santee	92071	San Diego	133
	2030 Prince Street	Newman	95360	Stanislaus	40
	1625 Rosemarie Lane	Stockton	95207	San Joaquin	80
	1805 East Bayshore	East Palo Alto	94303	San Mateo	94
	840 West Walnut Avenue	Orange	92868	Orange	75
	1820 Post Street	San Francisco	94115	San Francisco	72
	632 East 219th Street	Carson	90745	Los Angeles	62
	1201 40th Street	Bakersfield	93301	Kern	240
	2634 Copper Lane	San Bernardino	92408	San Bernardino	128
	6900 Seville Avenue	Huntington Park	90255	Los Angeles	162
	39410 Civic Center Drive	Fremont	94538	Alameda	322
	2760 McKee Road	San Jose	95127	Santa Clara	86
	1868 North Capital Avenue	San Jose	95132	Santa Clara	92
	2212 West Chestnut Avenue	San Bernardino	92410	San Bernardino	184
	1220 McMinn Avenue	Santa Rosa	95407	Sonoma	120
	2499 Decoto Road	Union City	94587	Alameda	125
	6450 Dougherty Road	Dublin	94568	Alameda	283
	918 Clay Street	Oakland	94607	Alameda	18
	5401 Norris Road	Bakersfield	93308	Kern	393
	6301 Victor Street	Bakersfield	93308	Kern	
	6300 Summerset Way	Bakersfield	93308	Kern	
	6300 Mohwak Street	Bakersfield	93308	Kern	
	2320 South K Street	Bakersfield	93301	Kern	
	10401 San Diego Street	Bakersfield	93241	Kern	
	550 Union Street	Arcata	95521	Humboldt	30
	2578 West Oak Circle	Santa Rosa	95401	Sonoma	52
	266 S. Cota Avenue	Corona	91720	Riverside	72
	1528 South Jeffrey	Anaheim	92802	Orange	100
	1532 South Michelle	Anaheim	92802	Orange	
	851 Pomona Avenue	Chico	95928	Butte	92
	12554 Avenue 408	Orosi	93647	Tulare	60
	6946 Foothill Blvd.	Oakland	96605	Alameda	65
	609 Richmar Avenue	San Marcos	92069	San Diego	49
	1101 Main Street	Half Moon Bay	94019	San Mateo	28
	1131 24th Street	Oakland	94607	Alameda	38
	1580 Falcon Drive	Salinas	93905	Monterey	68
	55 Mason Street	San Francisco	94102	San Francisco	134
	899 N. King Road	San Jose	95133	Santa Clara	75
	8890 Jamacha Road	Spring Valley	91977	San Diego	52

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	1423 Thousand Oaks Blvd.	Thousand Oaks	91362	Ventura	51
	4445 Third Street	San Francisco	94124	San Francisco	30
	12757 Seabreeze Farms Drive	San Diego	92130	San Diego	38
	2601 Castillo Court	San Jose	95127	Santa Clara	144
	4950 Empire Avenue	Oakley	94561	Contra Costa	80
	1414 North Broadway	Santa Maria	93454	Santa Barbara	16
	16901 Tornado Ave	Huron	93234	Fresno	40
	6401 Center Street	Clayton	94517	Contra Costa	86
	3950 N. Del Mar	fresno	93704	Fresno	48
	924 S. Osage Avenue	Inglewood	90301	Los Angeles	91
	10412 Stobaugh Street	Lamont	93241	Kern	65
	88 Sixth Street	San Francisco	94103	San Francisco	152
	2236 Tozer	Madera	93638	Madera	40
	1448 10th Street	Oakland	94607	Alameda	31
	2805 Park Meadow Drive	Santa Rosa	95407	Sonoma	41
	710 Vista Way	Red Bluff	96080	Tehama	72
	1935 Potrero Grande Road	Monterey Park	91754	Los Angeles	114
	505 West Cross Street	Woodland	95695	Yolo	95
	428 West Mission Road	San Marcos	92069	San Diego	120
	15135 Kimberly Drive	Victorville	92394	San Bernardino	132
	27191 Paseo Espada	San Juan Capistrano	92675	Orange	84
	665 Queens Avenue	Yuba City	95991	Sutter	80
	3224 Adeline Street	Berkeley	94703	Alameda	19
	1636 Myrtle Avenue	Eureka	95501	Humboldt	40
	13728 San Pablo Avenue	San Pablo	94806	Contra Costa	82
	1166 Howard Street	San Francisco	94103	San Francisco	88
	701 Filbert Street	Oakland	94607	Alameda	126
	270 East Empire Street	San Jose	95112	Santa Clara	96
	454 Markham	Vacaville	95688	Solano	15
	43732 Challenger Way	Lancaster	93534	Los Angeles	200
	1600 S. Green Avenue	Dinuba	93618	Tulare	36
	131 Gable Avenue	Vacaville	95688	Solano	65
	734 W. La Jolla Blvd.	Placentia	92870	Orange	55
	12715 Maplevue Street	Lakeside	92040	San Diego	79
	438 Third Avenue	San Diego	92101	San Diego	45
	230 E. 18th Street	Marysville	95901	Yuba	77
	423 South Calle EL Segundo	Palm Springs	92262	Riverside	139
	2600 South Azusa Avenue	West Covina	91792	Los Angeles	188
	555 East Carson Street	Carson	90745	Los Angeles	84
	555 East Carson Street	Carson	90745	Los Angeles	65
	435 Autumn Drive	San Marcos	92069	San Diego	192
	3884 1/2 Caminito Aguilar	San Diego	92111	San Diego	312
	10931 Gerana Street	San Diego	92129	San Diego	504
	1316 Las Juntas Way	Walnut Creek	94596	Contra Costa	87
	2002 Rimbey Avenue	San Diego	92154	San Diego	240
	1018 Bellevue Avenue	Santa Rosa	95407	Sonoma	200
	4601 Montgomery Drive	Santa Rosa	95409	Sonoma	111
	10 Lincoln Avenue	Salinas	93901	Monterey	100
	46 Rockwood Drive	Grass Valley	95705	Nevada	80
	6053 Paseo Acampo	Carlsbad	92009	San Diego	116
	4765 Home Avenue	San Diego	92105	San Diego	100
	1025 Broadway	Chula Vista	91911	San Diego	119
	1700 Botelho Drive	Walnut Creek	94596	Contra Costa	116
	333 N. McDowell Blvd.	Petaluma	94954	Sonoma	240
	8720 Valley View Street	Buena Park	90620	Orange	110
	2459 West Steele Avenue	Santa Rosa	95403	Sonoma	48
	2808 Apple Valley	Santa Rosa	95403	Sonoma	
	2313 McKinleyville Avenue	McKinleyville	95519	Humboldt	24
	15370 Tropic Court	San Leandro	94579	Alameda	92
	900 North Cypress Street	La Habra	90631	Orange	72
	3545 Island Avenue	San Diego	92102	San Diego	122
	1055 Tata Lane	South Lake Tahoe	96150	El Dorado	70
	401 W. First Street	Santa Ana	92701	Orange	200
	333 West Main Street	Alhambra	91801	Los Angeles	110
	955 South Sixth Street	San Jose	95112	Santa Clara	103
	1288 East Hilldale Blvd.	Foster City	94404	San Mateo	159
	300 Bree Lane	Watsonville	95077	Santa Cruz	120
	3421 Spruce Avenue	South Lake Tahoe	95705	El Dorado	92

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	2950 Story Road	San Jose	95127	Santa Clara	81
	11851 Stuart Drive	Garden Grove	92843	Orange	239
	9649 Westminster Avenue	Garden Grove	92844	Orange	
	200 S. Glenn Drive	Camarillo	93010	Ventura	18
	1945 Cavallo Road	Antioch	94509	Contra Costa	24
	2501 Camara Circle	Concord	94520	Contra Costa	52
	2818 Ramada Drive	Paso Robles	93446	San Luis Obispo	110
	1191 Coleman Road	San Jose	95120	Santa Clara	141
	1498 Almaden Road	San Jose	95125	Santa Clara	140
	3811 Lakeside Drive	Richmond	94806	Contra Costa	192
	174 Ellis Street	San Francisco	94102	San Francisco	119
	180 Turk Street	San Francisco	94102	San Francisco	133
	1379 Mission Blvd.	Pomona	91766	Los Angeles	117
	1590 Broadway Street	San Francisco	94109	San Francisco	204
	560 North F Street	San Bernardino	92410	San Bernardino	161
	2751 Monument Blvd.	Concord	94521	Contra Costa	296
	1157 Turk Street	San Francisco	94102	San Francisco	98
	2580 South Bascom Avenue	Campbell	95008	Santa Clara	90
	2565 South Bascom Avenue	Campbell	95008	Santa Clara	125
	9039 Pioneer Blvd.	Santa Fe Springs	90670	Los Angeles	141
	965 West Arrow Highway	Claremont	91711	Los Angeles	150
	1055 Montebello Drive	Gilroy	95020	Santa Clara	70
	2301 Cooley Avenue	East Palo Alto	94303	San Mateo	78
	1601 Tenaka Place	Sunnyvale	94087	Santa Clara	211
	26836 Oso Parkway	Mission Viejo	92691	Orange	143
	1121 Virginia Lane	Concord	94520	Contra Costa	91
	12979 Community Road	Poway	92064	San Diego	71
	30490 Road 72	Goshen	93291	Tulare	64
	8684 Sierra Avenue	Fontana	92335	San Bernardino	108
	106 11th Street	McFarland	93250	Kern	46
	34 Turk Street	San Francisco	94102	San Francisco	178
	141 Eddy Street	San Francisco	94102	San Francisco	105
	230 Eddy Street	San Francisco	94102	San Francisco	179
	2651 "J"" Street"	San Diego	92102	San Diego	28
	2065 Avenida Del Mexico	San Diego	92154	San Diego	42
	18959 Road 190	Poplar	93257	Tulare	50
	240 Jones Street	San Francisco	94103	San Francisco	151
	1029 Campbell Street	Oakland	94607	Alameda	19
	1970 Lake Street	Huntington Beach	92648	Orange	20
	1148 West Boone Street	Santa Maria	93458	Santa Barbara	52
	1600 Poplar Avenue	Wasco	93280	Kern	44
	220 Calle Cesar E. Chavez	Guadalupe	93434	Santa Barbara	80
	811 West 4th Street	Antioch	94509	Contra Costa	57
	1329 Florence Avenue	Fresno	93706	Fresno	180
	2000 Monterey Road	San Jose	95112	Santa Clara	153
	1150 Tesoro Grove Way	San Diego	92154	San Diego	106
	1245 Innes Avenue	Hollywood	90026	Los Angeles	19
	15432 Jackson Street	Midway City	92655	Orange	30
	647 Perez Avenue	Mendota	93640	Fresno	81
	7521 Wyoming Street	Westminster	92683	Orange	76
	170 N. Prospect Street	Orange	92869	Orange	20
	3255 San Pablo Avenue	Oakland	94608	Alameda	65
	1027 60th Street	Oakland	94608	Alameda	17
	1060 West Grand Ave.	Oakland	94607	Alameda	151
	35 Laurel Drive	Danville	94526	Contra Costa	74
	525 14th Street	San Diego	92101	San Diego	200
	72 17th Street	San Diego	92101	San Diego	90
	74501 42nd Avenue	Palm Desert	92260	Riverside	163
	1301 Haven Drive	Arvin	93203	Kern	43
	750 Sereno Drive	Vallejo	94590	Solano	125
	250 Belmont St.	Delano	93215	Kern	81
	402 So. San Joaquin	Stockton	95203	San Joaquin	10
	310 E. Sonora Street	Stockton	95203	San Joaquin	
	16080 Dam Road	Clearlake	95422	Lake	80
	12811 Garden Grove Blvd.	Garden Grove	92843	Orange	82
	511 North Palmetto Avenue	Ontario	91762	San Bernardino	86
	3615 N. Pleasant Avenue	Fresno	93705	Fresno	100
	2555 Alum Rock Avenue	San Jose	95127	Santa Clara	55

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	4312 Potrero Avenue	Richmond	94804	Contra Costa	82
	3071 Rose Avenue	San Jose	95127	Santa Clara	66
	245 East First Street	Rialto	92376	San Bernardino	272
	8405 Telegraph Road	Pico Rivera	90660	Los Angeles	132
	24200 Silva Avenue	Hayward	94544	Alameda	81
	2960 MacIntyre Dr	San Jose	95136	Santa Clara	155
	1307 West 105th Street	Los Angeles	90044	Los Angeles	41
	1166 Howard Street	San Francisco	94103	San Francisco	74
	366 Camino de Estrella	San Clemente	92672	Orange	122
	710 Trancas Street	Napa	94558	Napa	117
	758 Lenzen	San Jose	95126	Santa Clara	88
	2150 Tice Valley Blvd.	Walnut Creek	94596	Contra Costa	91
	6404 Halyard Place	Carlsbad	92009	San Diego	28
	11030 Taffy Lane	Santee	92071	San Diego	82
	360 E. Washington Avenue	Escondido	92025	San Diego	44
	8590 Malvern Avenue	Rancho Cucamong	91730	San Bernardino	49
	13875 Carmel Valley Road	San Diego	92130	San Diego	112
	100 Chilpancingo Parkway	Pleasant Hill	94523	Contra Costa	70
	655 Richmond Avenue	San Jose	95128	Santa Clara	63
	1924 Camino del Sol	Oxnard	93030	Ventura	252
	190 Via Pelicano Road	Oceanside	92057	San Diego	56
	2037 Zinfandel Avenue	Santa Rosa	95401	Sonoma	129
	841 Monticelli Drive	Gilroy	95020	Santa Clara	52
	18992 Florida Street	Huntington Beach	92648	Orange	104
	13352 Torrey Meadows Drive	San Diego	92129	San Diego	76
	15690 Crestwood Drive	San Pablo	94806	Contra Costa	324
	200 S. Sycamore Street	Santa Ana	92701	Orange	58
	3025 Browns Valley Road	Napa	94558	Napa	75
	1045 Mission Street	San Francisco	94103	San Francisco	258
	3220 Santa Fe Way	Rocklin	95765	Placer	120
	1950 E. Badillo Street	West Covina	91791	Los Angeles	188
	4243 E. Alondra Blvd.	Compton	90221	Los Angeles	18
	6512 Rugby Avenue	Huntington Park	90256	Los Angeles	80
	575 Sacramento Street	Vallejo	94590	Solano	57
	1151 25th Street	San Diego	92154	San Diego	312
	6006 International Blvd.	Oakland	94621	Alameda	24
	1790 Del Sur Blvd.	San Ysidro	92173	San Diego	262
	229 West Grant Line Road	Tracy	95376	San Joaquin	72
	720 La Playa Street	San Francisco	94121	San Francisco	85
	1245 Market Street	San Diego	92101	San Diego	281
	8525 Paramount Blvd.	Downey	90240	Los Angeles	64
	2855 Villages Parkway	San Jose	95135	Santa Clara	79
	965 South Sixth Street	San Jose	95112	Santa Clara	88
	158 E. Bonita Avenue	Pomona	91767	Los Angeles	174
	981 West Tennyson Road	Hayward	94544	Alameda	96
	816 Minnie Street	Santa Ana	92701	Orange	127
	1945 Batson Avenue	Rowland Heights	91748	Los Angeles	144
	1800 Moore Blvd.	Davis	95616	Yolo	70
	4010 Park Haven Court	San Diego	92113	San Diego	40
	2360 Redwood Road	Napa	94559	Napa	115
	303 Checkers Drive	San Jose	95133	Santa Clara	700
	2717 Plaza Blvd.	National City	91950	San Diego	372
	440 Willow Glen Way	San Jose	95125	Santa Clara	133
	2605 La Hacienda Court	San Jose	95127	Santa Clara	69
	330 Redwood Ave.	Redwood City	94061	San Mateo	36
	3919 West Garden Grove Blvd	Orange	92868	Orange	333
	1776 Sutter Street	San Francisco	94109	San Francisco	34
	900 East Stanley Boulevard	Livermore	94550	Alameda	250
	303 W. Kimball Avenue	Visalia	93277	Tulare	95
	410 North White Road	San Jose	95127	Santa Clara	157
	2005 N. Guthrie Street	San Bernardino	92404	San Bernardino	160
	260 N. Midway Drive	Escondido	92027	San Diego	200
	6811 Embarcadero Lane	Carlsbad	92009	San Diego	92
	940 South Union Road	Manteca	95337	San Joaquin	68
	14730 East Prichard Street	La Puente	91744	Los Angeles	132
	123 Calle Amistad	San Clemente	92673	Orange	124
	2151 Plaza De Guadalupe	San Jose	95116	Santa Clara	101
	5441 N. Paramount Blvd.	Long Beach	90805	Los Angeles	528

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	1525 Margareta Place	Gilroy	95020	Santa Clara	75
	302 Fourth Street	San Rafael	94901	Marin	83
	1410 Roberts Avenue	San Jose	95122	Santa Clara	100
	1325 Santa Rita Drive	Chula Vista	91913	San Diego	271
	404 47th Avenue	San Diego	92102	San Diego	60
	4742 Solola Avenue	San Diego	92113	San Diego	170
	1101 Sycamore Avenue	Tustin	92780	Orange	54
	10533 Broken Oak Court	Penn Valley	95946	Nevada	42
	445 Redwood Street	Vallejo	94590	Solano	194
	2825 West Alamos Avenue	Fresno	93705	Fresno	256
	1589 Mesquite Dr.	Salinas	93905	Monterey	132
	1725 Almaden Road	San Jose	95125	Santa Clara	66
	851 S. Van Ness Avenue	Fresno	93721	Fresno	217
	1295 McLaughlin Avenue	San Jose	95122	Santa Clara	61
	2000 Pennsylvania Avenue	Fairfield	94533	Solano	56
	9920 Flora Vista Street	Bellflower	90706	Los Angeles	180
	136 Leibrandt Street	Santa Cruz	95060	Santa Cruz	48
	5875 Mission Blvd.	Rubidoux	92509	Riverside	109
	2010 Monterey Road	San Jose	95112	Santa Clara	152
	1125 California Avenue	Bakersfield	93301	Kern	180
	846 East Belgravia Avenue	Fresno	93706	Fresno	100
	17911 Bushard Street	Fountain Valley	92708	Orange	156
	901 Alturas Road	Fallbrook	92028	San Diego	80
	952 South Record Avenue	Los Angeles	90004	Los Angeles	11
	2361 University Avenue	East Palo Alto	94303	San Mateo	32
	1112 East Whitney Street	Avenal	93204	Kings	81
	2301 Northgate Avenue	Oakland	94612	Alameda	42
	1385 N. Hamilton Parkway	Novato	94949	Marin	59
	15500 Midtown Drive	Victorville	92392	San Bernardino	100
	567 Bay Street	San Francisco	94133	San Francisco	341
	2501 Red Bud Lane	Anderson	96007	Shasta	81
	710 Brundage Lane	Bakersfield	93304	Kern	78
	201 North Yucca Avenue	Barstow	92311	San Bernardino	81
	1251 E. 14th Ave.	Blythe	92225	Riverside	81
	50 East Market Street	Salinas	93907	Monterey	92
	1445 South 45th Street	San Diego	92113	San Diego	54
	3101 Boyd Road	Arcata	95521	Humboldt	64
	70 Kentucky Place	San Jose	95116	Santa Clara	25
	2600 Olympic Avenue	Corcoran	93212	Kings	42
	4071 39th Street	San Diego	92105	San Diego	120
	2239 Meda Ave.	Santa Rosa	95404	Sonoma	122
	160 Wilford Lane	Cotati	94931	Sonoma	36
	172 6th Street	San Francisco	94103	San Francisco	75
	501 South Meta Street	Oxnard	93033	Ventura	24
	750 Second Street	Orange Cove	93646	Fresno	73
	421 Turk Street	San Francisco	94102	San Francisco	29
	338 Sherwood Way	Madera	93637	Madera	81
	550 West Springville Avenue	Porterville	93257	Tulare	81
	7541 Wyoming Street	Westminster	92683	Orange	22
	1350 7th Street	Oakland	94607	Alameda	168
	2111 Williams Street	Long Beach	90810	Los Angeles	204
	1918 Alum Rock Avenue	San Jose	95116	Santa Clara	93
	850 Kimball Road	Red Bluff	96080	Tehama	52
	11250 Lee Avenue	Adelanto	92301	San Bernardino	81
	133 E. Weber Avenue	Stockton	95202	San Joaquin	156
	93 East Date Avenue	Porterville	93257	Tulare	78
	3430 Foothill Blvd.	Oakland	94601	Alameda	20
	941 Lundy Ave.	San Jose	95133	Santa Clara	76
	4980 Hamilton Ave.	San Jose	95130	Santa Clara	98
	441 Ellis Street	San Francisco	94102	San Francisco	81
	1312 Caramel Street	San Luis Obispo	93401	San Luis Obispo	19
	1490 East Gate Way	Pleasanton	94566	Alameda	100
	2155 Lanai Avenue	San Jose	95122	Santa Clara	354
	101 Villa Serena Circle	Rocklin	95677	Placer	236
	455 Joiner Parkway at Fifth St	Lincoln	95648	Placer	120
	3941 W. Lowell Avenue	Tracy	95376	San Joaquin	216
	2898 Villa Monterey	San Jose	95111	Santa Clara	120
	815 Bryte Avenue	West Sacramento	95605	Yolo	108

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	1155 North Detroit Street	West Hollywood	90046	Los Angeles	10
	8800 Lilly Avenue	Gilroy	95020	Santa Clara	84
	110 Bailey Road	Bay Point	94566	Contra Costa	72
	4224 Florence Avenue	Bell	90201	Los Angeles	63
	1151 Burton Drive	Vacaville	95687	Solano	120
	44063 Beech Avenue	Lancaster	93534	Los Angeles	100
	9177 Windsor Road	Windsor	95492	Sonoma	41
	10100 Valley Blvd.	El Monte	91731	Los Angeles	110
	6984 Torrey Santa Fe Road	San Diego	92129	San Diego	26
	6591 Rancho Del Sol Way	San Diego	92130	San Diego	32
	1280 Shaffer Road	Santa Cruz	95060	Santa Cruz	206
	1010 Pacific Avenue	Santa Cruz	95060	Santa Cruz	112
	1150 McLaughlin Avenue	San Jose	95122	Santa Clara	130
	200 Cranbrook Way	Santa Rosa	95407	Sonoma	68
	123 Calle Amistad	San Clemente	92673	Orange	62
	10902 Fulton Wells Avenue	Santa Fe Springs	90670	Los Angeles	144
	8885 Orville Street	Spring Valley	91977	San diego	60
	18701 Flying Tiger Drive	Santa Clarita	91387	Los Angeles	200
	12730 Briarcrest Place	San Diego	92130	San Diego	92
	929 West Cameron Avenue	West Covina	91792	Los Angeles	158
	2080 Alum Rock Avenue	San Jose	95116	Santa Clara	96
	1511 163rd Avenue	San Leandro	94578	Alameda	104
	13030 Ramona Blvd.	Baldwin Park	91706	Los Angeles	71
	210 Sutton Way	Grass Valley	95945	Nevada	80
	2600 Castillo Court	San Jose	95127	Santa Clara	49
	2618 East 16th Street	Oakland	94601	Alameda	35
	4262 Central Avenue	Fremont	94536	Alameda	81
	150 Berry Street	San Francisco	94107	San Francisco	100
	1 Church Street	San Francisco	94114	San Francisco	93
	2607 S. Linden Way	Palm Springs	92264	Riverside	60
	1605 Grandon Avenue	San Marcos	92069	San Diego	161
	1417 First Avenue	Oakland	94606	Alameda	55
	1211 Lyman Avenue	Covina	91724	Los Angeles	180
	163 Paradise Drive	Hercules	94547	Contra Costa	132
	530 Carter Street	San Francisco	94134	San Francisco	101
	7125 Amethyst Avenue	Rancho Cucamong	91730	San Bernardino	96
	20 Franklin Street	San Francisco	94103	San Francisco	68
	1315 Polk Street	San Francisco	94109	San Francisco	72
	340A Paraiso Drive	Watsonville	95076	Santa Cruz	51
	6570 Knott Avenue	Buena Park	90621	Orange	186
	162 Belvedere Street	San Rafael	94901	Marin	26
	4231 Alamo Street	Simi Valley	93063	Ventura	70
	4075 Prospect Avenue	Yorba Linda	92885	Orange	101
	75 Dore Street	San Francisco	94103	San Francisco	98
	1655 North Crawford Avenue	Dinuba	93618	Tulare	80
	2200 Valley View Parkway	El Dorado Hills	95762	El Dorado	180
	399 East Court	San Jose	95116	Santa Clara	80
	410 South Palm Drive	Novato	94949	Marin	128
	1800 Evans Lane	San Jose	95125	Santa Clara	239
	2350 McBride Lane	Santa Rosa	95403	Sonoma	80
	3401 Savannah Lane	West Sacramento	95691	Yolo	228
	2801 Dover Avenue	Fairfield	94533	Solano	200
	16507 Dove Canyon Road	San Diego	92127	San Diego	120
	6185 North Figarden Drive	Fresno	93722	Fresno	138
	190 N. Coventry Ave.	Clovis	93611	Fresno	140
	1923 Bush Street	Oceanside	92058	San Diego	186
	46 Tinker Way	Novato	94949	Marin	77
	2970 Tapo Canyon Road	Simi Valley	93063	Ventura	176
	367 E. Thousand Oaks Boulevard	Thousand Oaks	91360	Ventura	57
	1155 San Pablo Avenue	Albany	94706	Alameda	16
	421 South Street	Fort Bragg	95437	Mendocino	48
	416 Bay Street	San Francisco	94109	San Francisco	9
	1900 Poplar Avenue	Wasco	93280	Kern	34
	4700 Park Lane	Moorpark	93021	Ventura	190
	450 Joiner Parkway	Lincoln	95648	Placer	80
	69100 McCallum Way	Cathedral City	92234	Riverside	153
	463 Wooster Avenue	San Jose	95116	Santa Clara	201
	4901 Ruth Ave.	Long Beach	90805	Los Angeles	96

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	630 West Duarte Road	Monrovia	91016	Los Angeles	78
	863 River Road	Corona	92880	Riverside	360
	200 Lewis Road	San Jose	95111	Santa Clara	160
	1040 Red Hawk Lane	Auburn	95603	Placer	80
	310 East Dunne Avenue	Morgan Hill	95037	Santa Clara	62
	11856 Orange Street	Norwalk	90650	Los Angeles	240
	5684 Bay Street	Emeryville	94607	Alameda	284
	920 Larkin Street	Salinas	93907	Monterey	95
	853 East Commodore Drive	San Bruno	94066	San Mateo	300
	400 Limestone Way	Irvine	92618	Orange	120
	2590 Francisco Blvd.	Pacifica	94044	San Mateo	10
	2399 California Street	Signal Hill	90755	Los Angeles	92
	450 Glenneyre Street	Laguna Beach	92651	Orange	27
	16711 Chalon Road	Victorville	92392	San Bernardino	81
	205 Pueblo Avenue	Bay Point	94565	Contra Costa	180
	24115 Cottonwood Avenue	Moreno Valley	92552	Riverside	61
	2110 Prince Road	Newman	95360	Stanislaus	52
	7055 Old Highway 53	Clearlake	95422	Lake	60
	1003 Newport Ave.	Orland	95963	Glenn	33
	16500 Monterey Road	Morgan Hill	90537	Santa Clara	72
	99 27th Ave.	San Mateo	94403	San Mateo	50
	798 9th Ave.	San Diego	92101	San Diego	24
	1730 Elfin Forest Road	San Marcos	92078	San Diego	48
	5641 Imperial Ave	San Diego	92114	San Diego	50
	2505 Fifth Street	Sanger	93657	Fresno	74
	145 Taylor Street	San Francisco	94102	San Francisco	67
	962 South Pierce Avenue	Fresno	93721	Fresno	48
	654 Lozano Street	Mendota	93640	Fresno	81
	700 South 26th Street	Richmond	94804	Contra Costa	51
	13850 Tuolumne Street	Parlier	93648	Fresno	81
	1109 Oak Street	Oakland	94607	Alameda	39
	1719 University Avenue	Berkeley	94703	Alameda	27
	2989 Pullman Avenue	Richmond	94804	Contra Costa	199
	1217 South 7th Street	Avenal	93204	Kings	81
	2651 Whitson Street	Selma	93662	Fresno	53
	1001 Walnut Drive	Arvin	93203	Kern	80
	16980 Nisqualli Road	Victorville	92395	San Bernardino	96
	121 W. Phillips Blvd.	Pomona	91766	Los Angeles	174
	719 F Street	West Sacramento	95605	Yolo	51
	13600 E. Parlier Avenue	Parlier	93648	Fresno	62
	16946 Ceres Avenue	Fontana	92335	San Bernardino	93
	5506 Tam O Shanter Dr	Stockton	95210	San Joaquin	40
	4330 30th Street	San Diego	92104	San Diego	96
	400 Oak Hill Road	Paso Robles	93446	San Luis Obispo	68
	8140 13th Street	Westminster	92683	Orange	86
	398 West Walnut Avenue	Farmersville	93223	Tulare	48
	35820 South Lassen Avenue	Huron	93234	Fresno	61
	4145 Bay Street	Fremont	94538	Alameda	18
	1160 East Church Avenue	Fresno	93706	Fresno	72
	23 Nelson Avenue	Oroville	95965	Butte	61
	799 Fifth Street	McFarland	93250	Kern	61
	151 North Westwood Avenue	Lindsay	93247	Tulare	61
	312 South Austin Street	Delano	93215	Kern	20
	1400 Hood Street	Arvin	93203	Kern	27
	22 P Street	Bakersfield	93304	Kern	21
	988 Howard Street	San Francisco	94103	San Francisco	106
	4701 East Farmington Road	Stockton	95212	San Joaquin	76
	7606 Amador Valley Boulevard	Dublin	94568	Alameda	54
	1029 North Main Street	Jackson	95642	Amador	64
	544 West E Street	Tehachapi	93561	Kern	71
	24740 Jefferson Avenue	Murrieta	92562	Riverside	64
	700 Pinewood Court	Williams	95987	Colusa	72
	500 Potrero Street	San Francisco	94110	San Francisco	63
	701 New York Ranch Road	Jackson	95642	Amador	56
	265 Sutton Way	Grass Valley	95945	Nevada	60
	3155 Smith Lane	Clearlake	95422	Lake	60
	101 E. San Fernando Street	San Jose	95112	Santa Clara	323
	1385 Lucretia Avenue	San Jose	95122	Santa Clara	100

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	12740 Gateway Park Rd.	Poway	92064	San Diego	84
	3549 Mt. Diablo Blvd.	Lafayette	94549	Contra Costa	75
	4372 Home Avenue	San Diego	92105	San Diego	94
	16000 E. Grayville Drive	La Mirada	90638	Los Angeles	122
	1689 Broadway	Chula Vista	91911	San Diego	106
	3118 Cesar Chavez	San Francisco	94110	San Francisco	160
	68200 33rd Avenue	Cathedral City	92234	Riverside	185
	150 West Las Tunas Drive	Arcadia	91007	Los Angeles	54
	1953 Dove Lane	Carlsbad	92009	San Diego	180
	100 Branham Lane East	San Jose	95111	Santa Clara	175
	125 Pajaro Circle	Freedom	95019	Santa Cruz	64
	2681 Driscoll Road	Fremont	94539	Alameda	51
	4651 Red Bluff Place	Carlsbad	92008	San Diego	106
	2901 Mary Ann Lane	Bay Point	94565	Contra Costa	88
	449 Tyrella Avenue	Mountain View	94043	Santa Clara	56
	28500 Pujol Street	Temecula	92590	Riverside	66
	1260 John Street	Salinas	93905	Monterey	219
	1301 Potrero Grande Drive	So. San Gabriel	91770	Los Angeles	53
	401 Cougar Way	Beaumont	92223	Riverside	144
	15320 Tropic Court	San Leandro	94579	Alameda	46
	10450 Valley Blvd.	El Monte	91731	Los Angeles	100
	91 Riverview Terrace	Benicia	94510	Solano	56
	31978 Castaic Road	Castaic	91384	Los Angeles	150
	1910 Camino Del Sol	Oxnard	93030	Ventura	120
	1240 W. Bethel Lane	Santa Maria	93458	Santa Barbara	204
	3201 Loma Verde Drive	San Jose	95117	Santa Clara	152
	1108 Crestfield Drive	San Ramon	94582	Contra Costa	350
	308 Eddy Street	San Francisco	94102	San Francisco	73
	790 Vista Montana Drive	Watsonville	95076	Santa Cruz	132
	875 Cinnabar Street	San Jose	95126	Santa Clara	245
	33155 Mission Blvd.	Union City	94587	Alameda	121
	931 Bismark Way	Oxnard	93033	Ventura	152
	1515 Lakeside Drive	Oakland	94612	Alameda	195
	39 Nelson Avenue	Oroville	95965	Butte	62
	1201 West Wood Street	Willows	95988	Glenn	60
	2096 East Los Feliz Drive	Thousand Oaks	91362	Ventura	25
	2005 Johnson Avenue	San Luis Obispo	93401	San Luis Obispo	41
	5050 Russo Drive	San Jose	95118	Santa Clara	126
	1065 8th Street	Oakland	94607	Alameda	231
	10 La Brea Way	San Rafael	94903	Marin	28
	455 Canal Street	San Rafael	94901	Marin	27
	1051 N. A Street	Oxnard	93030	Ventura	72
	35 East Washington Street	Petaluma	94952	Sonoma	81
	225 41st Street	Oakland	94611	Alameda	77
	225 Berry Street	San Francisco	94158	San Francisco	140
	12 Giacomini Road	Pt. Reyes Station	94956	Marin	27
	3431 Cornerstone Court	Pleasanton	94566	Alameda	172
	5663 Marden Street	Davis	95616	Yolo	36
	1151 N. Villa Avenue	Dinuba	93618	Tulare	76
	865 West Gettysburg	Clovis	93612	Fresno	76
	4000 El Camino Real	Irvine	92602	Orange	162
	5300 Trabuco Road	Irvine	92620	Orange	96
	2780 Ventura Street	Anderson	96007	Shasta	59
	2444 Moore Blvd.	Davis	95616	Yolo	59
	2517 Sacramento Street	Berkeley	94702	Alameda	40
	2400 Shady Willow Lane	Brentwood	94513	Contra Costa	178
	5207 52nd Place	San Diego	92105	San Diego	75
	110 Market Street	Soledad	93960	Monterey	60
	1834 Chablis Way	Gonzales	93926	Monterey	36
	16775 Saintsbury Glen	San Diego	92127	San Diego	119
	1156 San Luis Street	Los Banos	93635	Merced	50
	9345 Carlton Oaks Drive	Santee	92071	San Diego	130
	3401 North Sunrise Way	Palm Springs	92262	Riverside	66
	22198 Center Street	Castro Valley	94546	Alameda	28
	3301 Cimmarron Road	Cameron Park	95682	El Dorado	200
	7632 21st Street	Westminster	92683	Orange	92
	133 Shipley Street	San Francisco	94107	San Francisco	257
	836 Chesley Avenue	Richmond	94801	Contra Costa	30

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	1730 Elfin Forest Road	San Marcos	92078	San Diego	156
	1553 S. Escondido Blvd.	Escondido	92025	San Diego	87
	1611 S. Orange Place	Escondido	92025	San Diego	
	2420 Willow Pass Road	Bay Point	94565	Contra Costa	52
	250 St. Joseph Street	Rio Vista	94571	Solano	40
	15353 Goldenwest Street	Huntington Beach	92647	Orange	88
	3115 Finnian Way	Dublin	94568	Alameda	322
	4161 Keegan Street	Dublin	94568	Alameda	304
	8102 Ellis Avenue	Huntington Beach	92648	Orange	107
	1715 5th St.	Berkeley	94710	Alameda	62
	1726 6th St.	Berkeley	94710	Alameda	
	1816 6th St.	Berkeley	94710	Alameda	
	813 Hearst St.	Berkeley	94710	Alameda	
	211 East D Street	Dixon	95620	Solano	81
	1501 Almaden Expressway	San Jose	95125	Santa Clara	226
	381 E. Hueneme Rd.	Oxnard	93030	Ventura	52
	1315 West Beverly Blvd.	Montebello	90640	Los Angeles	189
	1395 North Lincoln Street	Dixon	95620	Solano	172
	531 Woodside Road	Redwood City	94061	San Mateo	72
	1331 Cottonwood Road	Bakersfield	93307	Kern	86
	1601 Tenaka Place	Sunnyvale	94087	Santa Clara	66
	956 Avenida Del Vista	Corona	92882	Riverside	160
	1359 Worley Road	Suisun City	94585	Solano	81
	1950 Palm Avenue	Wasco	93280	Kern	52
	4402 W. Avalon Avenue	Fresno	93722	Fresno	74
	700 South 26th Street	Richmond	94804	Contra Costa	67
	1730 Bay Road	East Palo Alto	94303	San Mateo	77
	1437 J Street	San Diego	92101	San Diego	74
	1349 26th Street	Santa Monica	90404	Los Angeles	44
	102 Civic Drive	Hercules	94547	Contra Costa	52
	10563 E. Jefferson Ave.	Del Rey	93616	Fresno	48
	1424 Broadway	Santa Monica	90404	Los Angeles	41
	5252 El Cajon Boulevard	San Diego	92115	San Diego	91
	700 South 26th Street	Richmond	94804	Contra Costa	123
	66765 Two Bunch Palms Trail	Desert Hot Springs	92240	Riverside	60
	200 N. Yucca Avenue	Barstow	92311	San Bernardino	81
	560 Adams Avenue	Orange Cove	93646	Fresno	81
	400 N. Foothill Drive	Yreka	96097	Siskiyou	61
	668 S. Comanche Dr.	Arvin	93203	Kern	61
	16980 Nisqualli Road	Victorville	92395	San Bernardino	80
	528 East Market Street	Salinas	93905	Monterey	25
	1455 N Hamilton Parkway	Novato	94949	Marin	41
	18444 Yorba Linda Blvd.	Yorba Linda	92886	Orange	44
	241 North Courtland Avenue	Arroyo Grande	93420	San Luis Obispo	108
	855 W. Jackman Street	Lancaster	93534	Los Angeles	150
	1525 Lotus Lane	Bakersfield	93307	Kern	113
	1643 Pacific Avenue	Long Beach	90813	Los Angeles	42
	1200 Park Avenue	Chico	95928	Butte	107
	1535 Park Boulevard	Orange Cove	93646	Fresno	81
	8622 Stanton Avenue	Buena Park	90620	Orange	150
	460 Ellis Street	San Francisco	94102	San Francisco	42
	1054 Washington Street	Bakersfield	93307	Kern	150
	32520 Pulaski Drive	Hayward	94544	Alameda	57
	1345 Emerald Drive	Long Beach	90026	Los Angeles	85
	1420 North Avenue	Corcoran	93212	Kings	81
	1755 Southridge Drive	Red Bluff	96080	Tehama	56
	570 Keyes Street	San Jose	95112	Santa Clara	88
	2129 Coronado Avenue	San Diego	92154	San Diego	50
	1119 Cottonwood Road	Bakersfield	93307	Kern	21
	200 North Kern Avenue	Los Angeles	90022	Los Angeles	49
	24115 Cottonwood Avenue	Moreno Valley	92553	Riverside	58
	2235 Third Street	San Francisco	94107	San Francisco	36
	178 Townsend Street	San Francisco	94107	San Francisco	18
	154 North Arroyo Seco	Ione	95640	Amador	44
	425 West Chestnut Street	Dixon	95620	Solano	56
	431 East Ash Street	Shafter	93263	Kern	84
	2870 Oak Creek Road	Mojave	93501	Kern	42
	120 Macdonald Avenue	Richmond	94801	Contra Costa	26

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	2684 Coloma Court	Placerville	95667	El Dorado	84
	5757 Shannon Bay Drive	Rocklin	95677	Placer	50
	6065 Old Redwood Highway	Windsor	94931	Sonoma	65
	28955 Pujol Street	Temecula	92590	Riverside	49
	18414 Jonathan Street	Adelanto	92301	San Bernardino	30
	633 East Main Street	San Jacinto	92583	Riverside	46
	740 S. 36th Street	San Diego	92113	San Diego	76
	167 South Palm Street	Ventura	93001	Ventura	42
	115 S. Locke Street	Lindsay	93247	Tulare	60
	1515 Spruce Street	Anderson	96007	Shasta	160
	315 East Lake Street	Weed	96094	Siskiyou	50
	42176 Lyndie Lane	Temecula	92591	Riverside	40
	3240 Sacramento Street	Berkeley	94702	Alameda	16
	801 Dutton Street	Winters	95694	Yolo	39
	336 California St.	Stockton	95203	San Joaquin	18
	333 Malbec Ct	Stockton	95203	San Joaquin	
	80 Cary Street	Paso Robles	93446	San Luis Obispo	81
	1506 Commercial Street	San Diego	92101	San Diego	140
	3615 Main Street	Fremont	94538	Alameda	64
	14570 W. California Avenue	Kerman	93630	Fresno	16
	300 New York Ranch Road	Jackson	95642	Amador	86
	2640 E. Anaheim St. Long Bea	Long Beach	90804	Los Angeles	14
	703 N. Lacy Street	Santa Ana	92701	Orange	35
	702 S. Raitt Street	Santa Ana	92704	Orange	
	9757 Marilla Drive	Lakeside	92040	San Diego	80
	1911 Finnell Road	Yountville	94599	Napa	36
	4140 Bonillo Drive	San Diego	92115	San Diego	93
	13233 Foothill Blvd	Rancho Cucamong	91730	San Bernardino	225
	422 W. Cascade Dr.	Rialto	92367	San Bernardino	42
	1423 N. Vista Ave.	Rialto	92367	San Bernardino	
	141 Donahue Street	Marin City	94965	Marin	225
	34800 11th Street	Union City	94587	Alameda	100
	1338 East San Antonio Street	San Jose	95116	Santa Clara	84
	1777 Newbury Park Drive	San Jose	95133	Santa Clara	185
	5315 Carnel Valley Road	Carmel	93923	Monterey	200
	18191 Parktree Circle	Huntington Beach	92648	Orange	164
	893 Lenzen Avenue	San Jose	95126	Santa Clara	94
	245 E. Julian Street	San Jose	95112	Santa Clara	9
	355 Judro Way	San Jose	95117	Santa Clara	125
	2044 Lucretia Avenue	San Jose	95122	Santa Clara	16
	7750 Wren Avenue	Gilroy	95020	Santa Clara	75
	325 Front Street	Salinas	93901	Monterey	171
	16424 Ceres Ave.	Fontana	92335	San Bernardino	60
	1345 W. 105th Street	Los Angeles	90044	Los Angeles	62
	151 North Locust Street	Inglewood	90301	Los Angeles	104
	200 Chipmunk St.	Kings Beach	96143	Placer	77
	325 Deer St.	Kings Beach	96143	Placer	
	265 Fox St.	Kings Beach	96143	Placer	
	8500 Trout Ave.	Kings Beach	96143	Placer	
	8818 Brook St.	Kings Beach	96143	Placer	
	53813 Santa Margarita Street	San Diego	92114	San Diego	49
	1234 North Hayworth Avenue	West Hollywood	90046	Los Angeles	48
	14045 Brighton Avenue	Poway	92064	San Diego	77
	771 Black Diamond Street	Pittsburg	94565	Contra Costa	111
	31114 Road 72	Goshen	93291	Tulare	56
	10050 Juniper Ave.	Fontana	92335	San Bernardino	46
	1424 Jefferson Street	Oakland	94612	Alameda	102
	587 15th Street	Oakland	94612	Alameda	
	609 Oak Street	Oakland	94607	Alameda	70
	1526 S. Court St.	Visalia	93277	Tulare	20
	110 E. Paradise	Visalia	93277	Tulare	
	1401 S Street	Bakersfield	93301	Kern	70
	457 W. Gonzalez Road	Oxnard	93036	Ventura	18
	98 Archer Street	San Jose	95112	Santa Clara	42
	520 S. Trinity Street	Fresno	93706	Fresno	21
	111 South College Avenue	Claremont	91711	Los Angeles	76
	375 E. Thompson Blvd	Ventura	93001	Ventura	37
	396 Charles Street	Moorpark	93020	Ventura	20

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	14119 Mill Street	Guerneville	95446	Sonoma	48
	4268 Center Street	Piru	93040	Ventura	66
	455 Westside Blvd.	Hollister	95023	San Benito	31
	340 E. 2nd Street	Irvine	92620	Orange	60
	210 W. Santa Barbara Street	Santa Paula	93060	Ventura	16
	2120 Medical Center Dr.	San Bernardino	92411	San Bernardino	80
	2003 South Reservoir Street	Pomona	91766	Los Angeles	19
	2602 Broadway	Santa Monica	90404	Los Angeles	33
	29930 Winterhawk Rd.	Menifee	92586	Riverside	81
	2650 Spruce Street	Wasco	93280	Kern	58
	295 W. Sumner Ave.	Lake Elsinore	92530	Riverside	113
	16451 E. Buena Vista Ave.	Orange	92865	Orange	17
	2172 Dockery Court	Stockton	95206-2457	San Joaquin	75
	1525 East Cleveland Avenue	Madera	93638	Madera	68
	1319 Wescott Road	Colusa	95932	Colusa	96
	1985 National Ave.	San Diego	92113	San Diego	92
	441 E. St. Charles Street	San Andreas	95249	Calaveras	48
	7911 Slater Avenue	Huntington Beach	92647	Orange	6
	421 East Cota Street	Santa Barbara	93101	Santa Barbara	16
	34800 11th St.	Union City	94587	Alameda	57
	740 Sycamore Rd.	Arvin	93203	Kern	49
	789 I Street	Arcata	95521	Humboldt	29
	201 Pacifica Blvd.	Watsonville	95076	Santa Cruz	20
	5161 East Kings Canyon Road	Fresno	93727	Fresno	56
	832 South D Street	Perris	92570	Riverside	60
	150 Otis Street	San Francisco	94103	San Francisco	76
	636 El Camino Real	South San Francisc	94080	San Mateo	62
	5051 E. 3rd Street	Los Angeles	90022	Los Angeles	60
	701 Golden Gate Avenue	San Francisco	94102	San Francisco	100
	415 E Carson Street	Carson	90745	Los Angeles	65
	65921 Flora Avenue	Desert Hot Springs	92240	Riverside	62
	1235 Long Beach Boulevard	Long Beach	90813	Los Angeles	39
	720 East 11th Street	Oakland	94606	Alameda	55
	1350 W San Joaquin Ave	Tulare	93274	Tulare	49
	33 St. Joseph Street	Los Alamos	93440	Santa Barbara	39
	127 Orange	Goleta	93117	Santa Barbara	54
	120 Magnolia	Goleta	93117	Santa Barbara	
	301 Ellwood Beach	Goleta	93117	Santa Barbara	
	3970 Rocklin Rd	Rocklin	95677	Placer	44
	3195 Briarwood Avenue	Anderson	96007	Shasta	108
	678 North King Road	San Jose	95133	Santa Clara	94
	2050 Delaware Street	Berkeley	94709	Alameda	60
	225 Orange Avenue	Coronado	92118	San Diego	18
	8616 Fanita Drive	Santee	92071	San Diego	48
	480 Ellis Street	San Francisco	94102	San Francisco	153
	220 Golden Gate Avenue	San Francisco	94102	San Francisco	174
	10799 Poplar Street	Loma Linda	92354	San Bernardino	120
	1330 University Avenue	Berkeley	94702	Alameda	35
	210 W. Santa Barbara Street	Santa Paula	93060	Ventura	74
	11370 Mimosa Street	Ventura	93004	Ventura	60
	971 Las Tablas Drive	Templeton	93465	San Luis Obispo	53
	1450 E. Barnard	Blythe	92225	Riverside	73
	200 Birch Street	Blythe	92225	Riverside	
	Rodeo Drive	Victorville	92395	San Bernardino	48
	510 W. Elm Ave.	Tulare	93274	Tulare	57
	600 Fairfax Road	Bakersfield	93306-3869	Kern	85
	467 Turk Street	San Francisco	94102	San Francisco	94
	2161 Hartford Drive	Chico	95928	Butte	90
	10117 Garvey Avenue	El Monte	91733	Los Angeles	68
	67150 Hacienda Avenue	Desert Hot Springs	92240	Riverside	60
	6888 Lion Way	Oakland	94607	Alameda	72
	1640 Ruby Drive	Perris	92571	Riverside	88
	32209 Riverside Drive	Lake Elsinore	92530	Riverside	88
	32211 Riverside Drive	Lake Elsinore	92530	Riverside	64
	365 Q Street	Palmdale	93550	Los Angeles	156
	150 E. Nuevo	Perris	92571	Riverside	76
	2122 Burdock Way	Chula Vista	91915	San Diego	143
	3701 Peralta Blvd	Fremont	94536	Alameda	98

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	80 Montecito Vista Drive	San Jose	95111	Santa Clara	92
	1633 Harrison Street	Oakland	94612	Alameda	73
	10860 Merritt Street	Castroville	95012	Monterey	58
	1150 New York Street	Long Beach	90813	Los Angeles	140
	4105 Georgia Street	San Diego	92103	San Diego	31
	657 Acacia Lane	Santa Rosa	95409	Sonoma	44
	1189 Tabor Avenue	Fairfield	94533	Solano	93
	636 El Camino Real	South San Francisco	94080	San Mateo	46
	506 Civic Center Blvd	Suisun	94585	Solano	106
	227 West Point Road	San Francisco	94124	San Francisco	107
	2405 Aster Place	Eureka	95501	Humboldt	40
	16 Campus Drive	Arcadia	91007	Los Angeles	43
	400 Springlake Drive	San Leandro	94578	Alameda	143
	1011 Pine Avenue	Long Beach	90813	Los Angeles	200
	69175 Converse Road	Cathedral City	92234	Riverside	80
	2090 Yosemite Avenue	Simi Valley	93063	Ventura	108
	200 E. Anaheim Street	Long Beach	90813	Los Angeles	161
	17100 Cambridge Way	Tustin	92780	Orange	240
	700 Arbor Parkway	Hemet	92545	Riverside	68
	2311 Ivy Hill Way	San Ramon	94582	Contra Costa	293
	1001 Harvey Dr.	Walnut Creek	94956	Contra Costa	418
	1301 Las Juntas Way	Walnut Creek	94956	Contra Costa	
	7000 Sunne Lane	Walnut Creek	94956	Contra Costa	
	6900 Mariposa Circle	Dublin	94568-3153	Alameda	180
	65 McCreery Avenue	San Jose	95116	Santa Clara	93
	14644 W. Kearney Blvd	Kerman	93630	Fresno	44
	2802 Pico Boulevard	Santa Monica	90405	Los Angeles	33
	1601 E. California Avenue	Bakersfield	93307	Kern	49
	3501 San Pablo Avenue	Oakland	94608	Alameda	137
	19344 Sonoma Highway	Sonoma	95476	Sonoma	43
	360 Park Avenue	Pismo Beach	93449	San Luis Obispo	14
	17647 Crest Avenue	Morgan Hill	95037	Santa Clara	50
	2672 E. Hillcrest Dr.	Thousand Oaks	91362	Ventura	60
	609 E. 6th Street	Santa Ana	92701	Orange	74
	612 E. Santa Ana Blvd.	Santa Ana	92701	Orange	
	621 N. Minter Street	Santa Ana	92701	Orange	
	601 Lacy Street	Santa Ana	92701	Orange	
	10165 El Camino Real	Atascadero	93422	San Luis Obispo	95
	350 Golden Gate Avenue	San Francisco	94102	San Francisco	70
	1 Maple Park	Live Oak	95953	Sutter	56
	625 Marjorie Street	Mt. Shasta	96067	Siskiyou	44
	3030 Cowell Boulevard	Davis	95617	Yolo	69
	1250 Sixth Avenue	San Diego	92101	San Diego	92
	24740 Jefferson Avenue	Murrieta	92562	Riverside	40
	360 Linda Way	El Cajon	92020	San Diego	49
	131 Chambers Street	El Cajon	92020	San Diego	
	1017 E. Dome Street	Avenal	93204	Kings	80
	505 S. Corcoran Street	Avenal	93204	Kings	
	1299 Locust Street	Willits	95490	Mendocino	69
	300 Creekside	Willits	95490	Mendocino	
	7806 Sierra Avenue	Fontana	92336	San Bernardino	53
	4317 Carlin Ave	Lynwood	90262	Orange	99
	11042 Washington Blvd	Culver City	90232	Los Angeles	32
	12524 Philadelphia Street	Whittier	90601	Los Angeles	21
	15880 W. Gateway Blvd.	Kerman	93630	Fresno	69
	1555 Santa Clara Street	Fresno	93706	Fresno	70
	15 Minto Road	Watsonville	95076	Santa Cruz	87
	13600 Wood Street	Madera	93638	Madera	48
	25 Essex Street	San Francisco	94105	San Francisco	120
	5 Haciendas	Salinas	93901	Monterey	52
	9602 W. Ball Road	Anaheim	92804	Orange	29
	205 North Blackstone Avenue	Fresno	93701	Fresno	30
	220 Ross Avenue	Watsonville	95019	Santa Cruz	200
	405 Autumn Drive	San Marcos	92069	San Diego	48
	26288 Clark Street	Madera	93638	Madera	65
	335 Cinnamon Drive	Lemoore	93245	Kings	80
	901 W. Church Avenue	Ridgecrest	93555	Kern	32
	1190 E. 9th Street	Chico	95928	Butte	38

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	526 Sloan Lane	Bakersfield	93306	Kern	64
	2245 Valley View Street	Selma	93662	Fresno	66
	3568 Harding Street	Carlsbad	92008	San Diego	50
	1820 E. Meats Ave.	Orange	92865	Orange	63
	3562 Main Street	Lemon Grove	91945	San Diego	56
	1600 W. Memory Lane	Santa Ana	92706	Orange	41
	1305 Dahlia Court	Carpinteria	93013	Santa Barbara	33
	512 Bath Street	Santa Barbara	93101	Santa Barbara	54
	500 West Columbus Street	Bakersfield	93301	Kern	56
	25 Lincoln Avenue	Salinas	93901	Monterey	52
	10603 Axtell Street	Castroville	95012	Monterey	59
	430 Pico	Santa Monica	90405	Los Angeles	31
	16495 Valley Blvd.	Fontana	92335	San Bernardino	46
	26606 Woodland Avenue	Esparto	95627	Yolo	40
	4300 Sunset Lane	Shingle Springs	95816	El Dorado	40
	44 West I Street	Los Banos	93635	Merced	68
	473 Ellis Street	San Francisco	94102	San Francisco	60
	252 13th Street	Greenfield	93927	Monterey	41
	550 E. Glenn Avenue	Coalinga	93210	Fresno	80
	69 Carol Lane	Oakley	94561	Contra Costa	44
	444 Ropes Avenue	Woodlake	93286	Tulare	60
	55 Havenwood Ave	Brentwood	94513	Contra Costa	54
	2650 Orbiter Street	Brea	92821	Orange	115
	235 E. Dunne Avenue	Morgan Hill	95037-4610	Santa Clara	39
	1075 Le Conte Avenue	San Francisco	94124	San Francisco	73
	2601 School Street	Fortuna	95540	Humboldt	35
	350 N. M Street	Dinuba	93618	Tulare	62
	141 E. El Norte Parkway	Escondido	92026	San Diego	36
	641 N. Vulcan Ave.	Encinitas	92024	San Diego	19
	4 S. D Street	Perris	92570	Riverside	84
	1168 36th Street	Emeryville	94608	Alameda	69
	2000 S. Delaware Street	San Mateo	94403	San Mateo	59
	501 E. Fifth Street	Santa Ana	92701	Orange	40
	507 N. Mortimer Street	Santa Ana	92701	Orange	
	507 N. Minter Street	Santa Ana	92701	Orange	
	602 E. Sixth Street	Santa Ana	92701	Orange	
	631 N. Lacy Street	Santa Ana	92701	Orange	
	680 N. Garfield Street	Santa Ana	92701	Orange	
	1240 Plumas Street	Yuba City	95991	Sutter	15
	E. Atherton & Spreckles Road	Manteca	95337	San Joaquin	152
	34955 Yucaipa Blvd	Yucaipa	92399	San Bernardino	45
	6947 Mohawk Trail	Yucca Valley	92284	San Bernardino	33
	200 North 9th Street	Blythe	92225	Riverside	51
	1815 Hancock Street	San Diego	92110	San Diego	85
	6971 Mohawk Trail	Yucca Valley	92284	San Bernardino	50
	41730 Road 128	Orosi	93647	Tulare	160
	41334 Road 127	Orosi	93647	Tulare	
	12415 Avenue 416	Orosi	93647	Tulare	
	1101 Prospect Ave	Santa Rosa	95409	Sonoma	50
	2875 Cowley Way	San Diego	92117	San Diego	198
	601 North Market Street	Inglewood	90302	Los Angeles	50
	3795 Florida Street	San Diego	92104	San Diego	83
	215 Reservation Road	East Garrison	93933	Monterey	65
	Summer Lane and E. Washing	Crescent City	95531	Del Norte	57
	1924 Euclid Street	Santa Monica	90404	Los Angeles	49
	1753 18th Street	Santa Monica	90404	Los Angeles	
	1753 19th Street	Santa Monica	90404	Los Angeles	
	217 S. Birch Street	Santa Ana	92701	Orange	51
	2345 Virginia Avenue	Santa Monica	90404	Los Angeles	46
	12510 Oak Knoll Road	Poway	92064	San Diego	52
	24425 Skyview Ridge Drive	Murrieta	92562	Riverside	397
	325 N. McDowell Blvd	Petaluma	94594	Sonoma	68
	15999 Avenue 327	Ivanhoe	93235	Tulare	72
	96 Shasta Court	Chowchilla	93610	Madera	60
	2750 Gilmore Lane	Oroville	95966	Butte	57
	13481 Silver Ivy Lane	San Diego	92129	San Diego	21
	527 West Regent Street	Inglewood	90301	Los Angeles	145
	5720 Clara Street	Bell Gardens	90201	Los Angeles	65

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	99 School Street	Daly City	94014	San Mateo	71
	6730 Mission Street	Daly City	94014	San Mateo	
	800 John Street	Pinole	94564	Contra Costa	70
	13001 Bowron Road	Poway	92064	San Diego	60
	295 Joerschke Road	Grass Valley	95945	Nevada	56
	707 Main Street	Vallejo	94590	Solano	29
	441E. 9th St.	Pittsburg	94565	Contra Costa	30
	438 E Santa Fe Ave.	Pittsburg	94565	Contra Costa	
	1065 Beacon St.	Pittsburg	94565	Contra Costa	
	16201 Palmer Avenue	Huron	93234	Fresno	76
	1272 26th Avenue	Oakland	94601	Alameda	62
	570 Derrick Avenue	Mendota	93640	Fresno	81
	1000 2nd Street	Mendota	93640	Fresno	
	5321 Telegraph Avenue	Oakland	94609	Alameda	201
	135 Franklin Street	Mountain View	94041	Santa Clara	51
	1801 E. 68th Street	Long Beach	90805	Los Angeles	78
	1528 Freeman Avenue	Long Beach	90804	Los Angeles	
	805 Avila Street	Parlier	93648	Fresno	33
	806 Diablo Avenue	Novato	94947	Marin	61
	2726 Kollmar Avenue	San Jose	95127	Santa Clara	59
	333 Fell Street	San Francisco	94102	San Francisco	82
	24919 Hemlock Ave.	Moreno Valley	92557	Riverside	78
	3421 Hudson Court	Antioch	94509	Contra Costa	122
	Clark Rd and Buschmann Road	Paradise	95969	Butte	35
	191 Heritage Lane	Dixon	95620	Solano	59
	8964 Hall Road	Lamont	93241	Kern	48
	1902 Lakewood Drive	San Jose	95132	Santa Clara	168
	32300 Almaden Boulevard	Union City	94587	Alameda	140
	508 Dublin Manor Court	Bakersfield	93306	Kern	60
	121 Golden Gate Avenue	San Francisco	94102	San Francisco	90
	9554 Via Zapador	Santee	92071	San Diego	44
	1725 Ocean Avenue	Santa Monica	90401	Los Angeles	160
	1275 El Camino Real	Millbrae	94030	San Mateo	27
	3290 East Artesia Boulevard	Long Beach	90805	Los Angeles	61
	1422 San Fernando Road	San Fernando	91340	Los Angeles	19
	551 S. Kalisher Street	San Fernando	91340	Los Angeles	
	1010 S. 3rd Street	San Jose	95112	Santa Clara	37
	2401 Shady Lane	Anderson	96007	Shasta	34
	310 West Jackson Street	Rialto	92376	San Bernardino	32
	380 N. Mollison Avenue	El Cajon	92021	San Diego	132
	1145 N. La Brea Ave.	West Hollywood	90038	Los Angeles	32
	1122 N. Detroit Street	West Hollywood	90046	Los Angeles	37
	7113 Santa Monica Blvd.	West Hollywood	90046	Los Angeles	
	1216 North La Brea Avenue	West Hollywood	90038	Los Angeles	38
	540 21st Street	Oakland	94607	Alameda	346
	6508 Rita Avenue	Huntington Park	90255	Los Angeles	103
	131 Park Avenue	San Fernando	91340	Los Angeles	62
	2358 S. El Camino Real	San Clemente	92672	Orange	76
	4170 Springlake Drive	San Leandro	94578	Alameda	840
	5655 Cypress	Oxnard	93033	Ventura	72
	830 16th Street	Wasco	93280	Kern	100
	1840 Poplar Avenue	Wasco	93280	Kern	
	128 Monroe Street	Arvin	93203	Kern	72
	12360 Main Street	Lamont	93241	Kern	
	21501 Lakeshore Drive	California City	93505	Kern	32
	729 Nord Avenue	Chico	95926	Butte	162
	38028 11th Street E.	Palmdale	93550	Los Angeles	64
	705 N. Oxnard Blvd	Oxnard	93030	Ventura	44
	28673 Pujol Street	Temecula	92590	Riverside	45
	474 Natoma Street	San Francisco	94103	San Francisco	60
	801 Howard Street	San Francisco	94103	San Francisco	182
	969 Porter Street	Vallejo	94590	Solano	181
	750 Mono Street	Fresno	93706	Fresno	60
	2617 Poso Dr.	Wasco	93280	Kern	78
	1200 Petaluma Blvd.	Petaluma	94952	Sonoma	66
	2530 International Blvd	Oakland	94601	Alameda	26
	1252 Palm Avenue	Imperial Beach	91932	San Diego	30
	655 Florence Street	Imperial Beach	91932	San Diego	

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	6455 Foothill Blvd	Oakland	94605	Alameda	51
	1180 4th Street	San Francisco	94158	San Francisco	150
	585 Sacramento Street	Auburn	95603	Placer	60
	8850 La Palma Avenue	Buena Park	90620	Orange	70
	37 Miwok	Mill Valley	94941	Marin	69
	3033 East Platt Ave	Fresno	93721	Fresno	118
	217 Eddy Street	San Francisco	94102	San Francisco	105
	762 West Lincoln Avenue	Woodland	95696	Yolo	44
	2772 Monterey Road	San Jose	95138	Santa Clara	75
	4251 Juniper Street	San Diego	92105	San Diego	40
	1040 University Avenue	Berkeley	94710	Alameda	74
	9th Avenue & Broadway	San Diego	92101	San Diego	129
	2 Irwin Way	Orinda	94563	Contra Costa	67
	81 Chestnut Street	Santa Cruz	94060	San Francisco	95
	21227 S. Figueroa Street	Carson	90745	Los Angeles	40
	626 West Parr Avenue	Los Gatos	95032	Santa Clara	105
	2390 Nut Tree Road	Vacaville	95687	Solano	46
	405 Autumn Drive	San Marcos	92069	San Diego	57
	8314 2nd Street	Downey	90241	Los Angeles	50
	700 Arnold Way	Half Moon Village	94019	San Mateo	45
	662 Garland Avenue	Sunnyvale	94086	Santa Clara	19
	1075 Martin Street	Lakeport	95453	Lake	48
	West Cherry Street and South	Dixon	95620	Solano	59
	920 6 1/2 Avenue	Corcoran	93212	Kings	78
	550 South Broadway Street	Blythe	92225	Riverside	64
	9051 W. Katella Ave	Anaheim	92804	Orange	38
	8911 W. Katella Ave.	Stanton	92804	Orange	26
	10920 MacArthur Boulevard	Oakland	94605	Alameda	33
	185 E. 9th Street	San Bernardino	92410	San Bernardino	119
	1500 Aspen Avenue	Tulare	93274	Tulare	47
	716 Descanso Street	Bakersfield	93306	Kern	17
	1218 West Imperial Hwy.	Los Angeles	90024	Los Angeles	72
	6337 Middleton Street	Huntington Park	90255	Los Angeles	23
	11240 Ramona Blvd.	El Monte	91731	Los Angeles	41
	1000 Macdonald Avenue	Richmond	94801	Contra Costa	63
	925 Main Street	Half Moon Bay	94019	San Mateo	40
	8780 Bell Road	Windor	95492	Sonoma	95
	3201 Pine Street	Paso Robles	94447	San Luis Obispo	80
	1000 Crested Bird	Irvine	92620	Orange	74
	7839 Soquel Drive	Aptos	95003	Santa Cruz	40
	66950 Ironwood Drive	Desert Hot Springs	92240	Riverside	96
	3348 Tyler Ave	El Monte	91731	Los Angeles	20
	2260 S. Netherton Ave.	Stockton	95205	San Joaquin	70
	Courtland St. & Strawberry St.	Arroyo Grande	93420	San Luis Obispo	36
	13218 Avalon Blvd	Los Angeles	90061	Los Angeles	55
	44155 Margarita Road	Temecula	92592	Riverside	60
	330 Cypress	Fort Bragg	95437	Mendocino	25
	2455 West Capitol Avenue	West Sacramento	95691	Yolo	50
	780 Sequoia Avenue	Lindsay	93247	Tulare	18
	3521 Pioneer Trail	South Lake Tahoe	96150	El Dorado	48
	1245 Bedford Ave	King City	93930	Monterey	57
	500 Marguerite St	Williams	95987	Colusa	48
	823 Rembrant Street	Bakersfield	93306	Kern	16
	2660 E. Clinton Avenue	Fresno	93703	Fresno	148
	649 East Florence Avenue	Fresno	93706	Fresno	34
	9501 W. Cerritos Avenue	Anaheim	92804	Orange	60
	275 Calle Cebu	Salinas	93901	Monterey	46
	6456 El Cajon Blvd.	San Diego	92115	San Diego	78
	116 E. 15th Street	Oakland	94606	Alameda	92
	1523 West San Carlos Street	San Jose	95126	Santa Clara	95
	644 14th Street	Oakland	94612	Alameda	73
	14141 Clarkdale Ave	Norwalk	90650-4171	Los Angeles	185
	240 Chinaberry Lane	San Marcos	92069	San Diego	84
	781 E. Cotati Avenue	Rohnert Park	94928	Sonoma	50
	4115 Kingsley Street	Montclair	91763-3534	San Bernardino	18
	57110 Twentynine Palms High	Yucca Valley	92284	San Bernardino	75
	14921 Stanford Avenue	Compton	90220	Los Angeles	108
	3595 Olive Street	Lemon Grove	91945	San Diego	80

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	1972 Los Feliz Drive	Thousand Oaks	91362	Ventura	36
	432 North Main Street	Piru	93040	Ventura	35
	110 Water Street	McCloud	96057	Siskiyou	41
	850 18th Street	Oakland	94607	Alameda	89
	215 West MacArthur Boulevard	Oakland	94611	Alameda	250
	34 E. Rosemary Street	San Jose	95112	Santa Clara	106
	66 E. Rosemary Street	San Jose	95112	Santa Clara	184
	3330 Santa Rosa Avenue	Santa Rosa	95407	Sonoma	60
	34160 Rebecca Way	Rancho Mirage	92270	Riverside	98
	618 21st Street	Oakland	94612	Alameda	100
	987 Postal Way	Vista	92083	San Diego	47
	3428 Esplanade Avenue	Chico	95973	Butte	49
	543 W. East Avenue	Chico	95926	Butte	90
	131 East Lugonia	Redlands	92374	San Bernardino	85
	61451 Verbena Road	Joshua Tree	92252	San Bernardino	50
	855 Wood Sorrel Drive	Petaluma	94954	Sonoma	50
	1000 Rosemary Avenue	Dinuba	93618	Tulare	48
	3428 Mount Diablo Boulevard	Lafayette	94549	Contra Costa	46
	100 Stadium Road	Madera	93637	Madera	40
	2nd Avenue & 9th Street	Marina	93933	Monterey	108
	868 Fargo Avenue	San Leandro	94579	Alameda	75
	251 28th Street	Oakland	94611	Alameda	200
	1959 High Place	Santa Monica	90404	Los Angeles	44
	Butterfield Blvd. & Barrett Ave	Morgan Hill	95037	Santa Clara	138
	499 Humboldt	Santa Rosa	95404	Sonoma	52
	4720 Logan Avenue	San Diego	92113	San Diego	54
	1550 Madonna Road	San Luis Obispo	93405	San Luis Obispo	120
	10846 Poplar Street	Loma Linda	92354	San Bernardino	50
	250 Silverado Trail	Napa	94559	Napa	134
	140 Cashmere Street	San Francisco	94124	San Francisco	101
	Charlotte Drive & Raleigh Road	San Jose	95123	Santa Clara	275
	660 North Quince Street	Escondido	92025	San Diego	161
	450 W. Springville Drive	Porterville	93257	Tulare	100
	4050 N. Fruit Avenue	Fresno	93705	Fresno	148
	7213 Clarendon Street	San Jose	95129	Santa Clara	80
	255 Broadway	San Francisco	94111	San Francisco	75
	100 Kings Circle	Cloverdale	95425	Sonoma	99
	959 Bridge Street	West Sacramento	95691	Yolo	70
	28901 Mission Blvd.	Hayward	94544	Alameda	151
	40767 Fremont Blvd.	Fremont	94538	Alameda	24
	200 Fagundes Street	Hayward	94544	Alameda	100
	671 W. A Street	Hayward	94541	Alameda	26
	41299 Paseo Padre Parkway	Fremont	94539	Alameda	99
	745 N. McDowell Blvd.	Petaluma	94954	Sonoma	129
	2141 Bancroft Avenue	San Leandro	94577	Alameda	26
	40789 Fremont Blvd.	Fremont	94538	Alameda	81
	22880 Watkins Street	Hayward	94541	Alameda	21
	Buckaroo Ave. & Winchester Lane	Oxnard	93030	Ventura	120
	833 Jamestown Avenue	San Francisco	94124	San Francisco	196
	301 Berrellesa St.	Martinez	94553	Contra Costa	49
	Commercial Street and 22nd Street	San Diego	92113	San Diego	130
	9th & Broadway	San Diego	92101	San Diego	121
	College Park Ave. & Eucalyptus	Chino	91710	San Bernardino	135
	201 Turk Street	San Francisco	94102	San Francisco	175
	3878 Beyer Boulevard	San Diego	92173	San Diego	82
	4245 Delta Street	San Diego	92113	San Diego	
	1012 Water St.	Bakersfield	93305	Kern	62
	2018 Pacific St.	Bakersfield	93305	Kern	
	727 Hunt Avenue	Saint Helena	94574	Napa	50
	1334 Cliff Drive	Santa Barbara	93019	Santa Barbara	107
	521 N. La Cumbre Road	Santa Barbara	93110	Santa Barbara	60
	12200 Gateway Court	Auburn	95603	Placer	56
	465 Bennett Street	Grass Valley	95945	Nevada	80
	17215 Marygold Ave	Fontana	92335	San Bernardino	80
	2 Boas Dr.	Santa Rosa	95409	Sonoma	43
	5174 Santa Rosa Creek Drive	Santa Rosa	95409	Sonoma	
	1401 N. Flower St.	Santa Ana	92706	Orange	200
	288 F Street	Chula Vista	91910	San Diego	186

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	1475 Oak Drive	Vista	92084	San Diego	76
	1095 Kendall Drive	San Bernardino	92407	San Bernardino	178
	5303 Stonehaven Drive	Yorba Linda	92877	Orange	125
	Camino San Bernardino and N	San Diego	92127	San Diego	165
	2019 E 122nd Street	Compton	90222	Los Angeles	61
	260 Farrell Avenue	Gilroy	95020	Santa Clara	74
	708 West Corregidor	Compton	90220	Los Angeles	164
	1006 Baker Street	Bakersfield	93305-4320	Kern	50
	E. Jarvis Street and Ruby Road	Perris	92570	Riverside	75
	2020 E. Dinuba Avenue	Reedley	93654	Fresno	60
	2001 River Avenue	Long Beach	90810	Los Angeles	81
	Pioneer Ave. & Farmers Centr	Woodland	95776	Yolo	62
	761 Camino Pescadero	Isla Vista	93117	Santa Barbara	33
	108 H Street	Crescent City	95531	Del Norte	56
	753 Rigby Avenue	Rio Dell	95562	Humboldt	49
	325 South Santa Fe Avenue	Vista	92083-5855	San Diego	69
	Visions and Roosevelt	Irvine	92620	Orange	104
	Sycamore Road and Meyer Str	Arvin	93201	Kern	72
	1099 Kendrea Street	McFarland	93250	Kern	48
	16309 Kent Avenue	Ashland	94580	Alameda	85
	819 North Rengstorff Avenue	Mountain View	94304-4353	Santa Clara	49
	1471 Addison Street	Berkeley	94702	Alameda	47
	1450 University Avenue	Berkeley	94702	Alameda	
	1640 Cabrillo Ave.	Torrance	90501	Los Angeles	44
	Westside Drive and Via Alta	San Diego	92108	San Diego	150
	530 Center Street	Highgrove	92507-1428	Riverside	89
	302 N. Tamarind Avenue	Compton	90220	Los Angeles	75
	121 S. Buena Vista Avenue	Corona	92882	Riverside	61
	137 S Palm St.	Ventura	93001	Ventura	142
	148 S Palm St.	Ventura	93001	Ventura	
	66 S Ventura Ave.	Ventura	93001	Ventura	
	401 E. Carson Street	Carson	90745	Los Angeles	40
	1125 Oregon Street	Crescent City	95531	Del Norte	38
	3155 Scott Street	San Francisco	94123	San Francisco	25
	7215 Bright Ave.	Whittier	90602	Los Angeles	156
	520 Colorado Avenue	Santa Monica	90401	Los Angeles	34
	1534 Third Avenue	Walnut Creek	94597	Contra Costa	48
	2618 Baldwin Lane	Walnut Creek	94597	Contra Costa	
	111 Straw Street	Mendota	93640	Fresno	124
	788 Quince Street	Mendota	93640	Fresno	
	791 I Street	Orange Cove	93646	Fresno	90
	101 Citrus Avenue	Orange Cove	93646	Fresno	
	1270 South Avenue	Orange Cove	93646	Fresno	
	1265 Adams Avenue	Orange Cove	93646	Fresno	
	4216 E. Hamilton Avenue	Fresno	93702	Fresno	193
	510 South Peach Avenue	Fresno	93727	Fresno	
	110 Lindberg St.	Santa Cruz	95060	Santa Cruz	21
	Snapdragon Street and Los An	Ventura	93004-1932	Ventura	28
	4096 Via Real	Carpinteria	93013	Santa Barbara	43
	620 E Maude Avenue	Sunnyvale	94085	Santa Clara	59
	1581 El Camino Real	Mountain View	94040	Santa Clara	27
	675 N. 6th Street	San Jose	95112	Santa Clara	75
	24317 E. Fourth St.	San Bernardino	92410	San Bernardino	40
	9 Bloom Lane	Half Moon Bay	94019	San Mateo	115
	1020 Rosemarie Lane	Stockton	95207	San Joaquin	30
	6119 Danny Drive	Stockton	95210	San Joaquin	40
	2455 West Capitol Avenue	West Sacramento	95691	Yolo	75
	512 Spruce Ave	Wheatland	95692	Yuba	88
	18151 Beach Blvd	Huntington Beach	92648	Orange	78
	1715 Washington Street	Calistoga	94515	Napa	48
	1110 S. I Street	Reedley	93654	Fresno	48
	904 South D Street	Perris	92570	Riverside	40
	112 Harding Street	San Fernando	91340	Los Angeles	29
	1701 Martin Luther King Jr. W	Oakland	94612	Alameda	26
	6431 Portola Drive	El Cerrito	94530	Contra Costa	57
	4125 Whittier Boulevard	Los Angeles	90023	Los Angeles	25
	837 S. Bonnie Beach Place	Los Angeles	90023	Los Angeles	
	Market Street and 14th Street	San Diego	92101	San Diego	150

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	1600 Marion Street	Kingsburg	93631	Fresno	46
	811 N. Eucalyptus Ave.	Inglewood	90302	Los Angeles	93
	3501 Santa Anita Avenue	El Monte	91731	Los Angeles	132
	2114 Long Beach Boulevard	Long Beach	90806	Los Angeles	41
	2601 Sunny Lane	Bakersfield	93305	Kern	40
	4250 Chestnut Ave	Fresno	93726	Fresno	40
	14930 Burns Valley Road	Clearlake	95422	Lake	40
	301 North Santa Fe Avenue	Vista	92084	San Diego	67
	240 Landis Avenue	Chula Vista	91910	San Diego	33
	6697 Old Redwood Highway	Windsor	95492	Sonoma	48
	678 W. 19th Street	Costa Mesa	92627	Orange	269
	801 Tupper Street	Santa Rosa	95404	Sonoma	159
	9800 MacArthur Blvd.	Oakland	94605	Alameda	32
	Montecito Vista Drive and Mo	San Jose	95111	Santa Clara	106
	653 East Juanita Avenue	San Dimas	91773	Los Angeles	65
	1511 Robinson Street	Oroville	95965	Butte	50
	825 S San Tomas Aquino Rd.	Campbell	95008	Santa Clara	100
	1909 Hackett Avenue	Mountain View	94043	Santa Clara	34
	275 East 12th Street	Oakland	94606	Alameda	40
	6710 Lion Way	Oakland	92621	Alameda	128
	29210 Stonewood Road	Temecula	92591	Riverside	55
	1401 Mission Street	San Francisco	94103	San Francisco	121
	6301 Atlantic Avenue	Long Beach	90805	Los Angeles	34
	4825 E. Fillmore Avenue	Fresno	93727	Fresno	90
	Telegraph Avenue and Macart	Oakland	94609	Alameda	90
	Park Avenue & Tustin Ranch R	Tustin	92606	Orange	225
	6330 Rugby Avenue	Huntington Park	90255	Los Angeles	184
	121 W. MacDonald Ave.	Richmond	94801	Contra Costa	158
	2105 East Avenue J8	Lancaster	93535	Los Angeles	109
	18555 Butterfield Blvd.	Morgan Hill	95037	Santa Clara	96
	460 Grand Avenue	Oakland	94610	Alameda	68
	22605 Grand Street	Hayward	94145	Alameda	22
	646 3rd Street	Woodland	95695	Yolo	48
	73 Carol Lane	Oakley	94561	Contra Costa	30
	528 De Luz Road	Fallbrook	92028	San Diego	32
	851 22nd Ave.	Delano	93215	Kern	128
	7000 Auburn Street	Bakersfield	93306	Kern	160
	1725 N Marks Ave.	Fresno	93722	Fresno	132
	1100 Ocean Avenue	San Francisco	94112	San Francisco	71
	8901 Calden Ave.	South Gate	90280	Los Angeles	216
	1761 Woodland Ave.	East Palo Alto	94303	San Mateo	49
	44 Newell Road	East Palo Alto	94303	San Mateo	
	1700 Huntington Drive	Duarte	91010	Los Angeles	43
	802 Van Ness Avenue	Fresno	93721	Fresno	45
	690 Beardsley Street	San Diego	92113	San Diego	70
	1280 Laguna Street	San Francisco	94115	San Francisco	182
	5729 West Las Positas Boulev	Pleasanton	94588	Alameda	168
	225 West Tulare Avenue	Shafter	93263	Kern	48
	550 Santa Maria Way	Shafter	93263	Kern	81
	304 Arroyo Seco Avenue	Shafter	93263	Kern	
	310 Mesa Verde Avenue	Shafter	93263	Kern	
	324 Tulare Avenue	Shafter	93263	Kern	
	1120 Heidi Drive	Greenfield	93927	Monterey	88
	730 Williams Rd.	Salinas	93905	Monterey	200
	7844 Paradise Valley Road	San Diego	92139	San Diego	448
	904 Donlon Ave.	Oxnard	93030	Ventura	36
	490 Pleasant Valley Rd	Oxnard	93033	Ventura	
	1907 Dartmouth Way	Salinas	93906	Monterey	100
	9000 Campina Drive	La Mesa	91942	San Diego	60
	8956 Harness Street	Spring Valley	91977	San Diego	104
	18 McArthur Place	Bakersfield	93308	Kern	70
	1100 Consuelo St.	Delano	93215	Kern	62
	1107 Francisco St	Berkeley	94701	Alameda	75
	1161 Francisco St	Berkeley	94701	Alameda	
	1323 Channing Way	Berkeley	94701	Alameda	
	1360 Dwight Way	Berkeley	94702	Alameda	
	2450 Valley St	Berkeley	94701	Alameda	
	1402 MLK Jr. Way	Berkeley	94709	Alameda	

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	1500 7th St	Berkeley	94701	Alameda	
	1903 Ward St	Berkeley	94701	Alameda	
	2024 Virigina St	Berkeley	94709	Alameda	
	2725 Sojourner Truth Ct	Berkeley	94701	Alameda	
	1812 Fairview St	Berkeley	94703	Alameda	
	1512 Alcatraz Ave	Berkeley	94701	Alameda	
	1605 Stuart St	Berkeley	94703	Alameda	
	3016 Harper St	Berkeley	94701	Alameda	
	2231 8th St	Berkeley	94701	Alameda	
	21659 Montgomery Avenue	Hayward	94541	Alameda	50
	1320 Addison Street	Berkeley	94702	Alameda	150
	1601 165th Ave	San Leandro	94578	Alameda	116
	225 Bennett Hill Court	Vacaville	95688	Solano	64
	470 Rocky Hill Road	Vacaville	95688	Solano	
	282 Danze Dr	San Jose	95111	Santa Clara	100
	655 W. Naomi Avenue	Arcadia	91007	Los Angeles	101
	1929 E. 122nd Street	Compton	90222	Los Angeles	60
	600 E. 4th Street	Long Beach	90802	Los Angeles	100
	508 East Mission Avenue	Escondido	92025	San Diego	61
	420 Maple Street	West Sacramento	95691	Yolo	40
	1751 Carroll Avenue	San Francisco	94124	San Francisco	121
	Potomac Ridge Road	San Diego	92127	San Diego	100
	400 20th Street	Bakersfield	93301	Kern	56
	3429 43rd St	San Diego	92105	San Diego	132
	3535 43rd St	San Diego	92105	San Diego	
	3536 43rd St	San Diego	92105	San Diego	
	3820 43rd St	San Diego	92105	San Diego	
	4085 44th St	San Diego	92105	San Diego	
	4251 44th St	San Diego	92105	San Diego	
	4048 48th St	San Diego	92105	San Diego	
	4217 Euclid Ave	San Diego	92105	San Diego	
	4165 Highland Ave	San Diego	92105	San Diego	
	3604 Van Dyke Ave	San Diego	92105	San Diego	
	1972 Los Feliz Drive	Thousand Oaks	91362	Ventura	20
	14th and Market Street	San Diego	92101	San Diego	53
	25942 E. Baseline Street	Highland	92410	San Bernardino	168
	North of Carmelita Court	Oxnard	93030	Ventura	64
	Ranch Parkway South & Alton	Lake Forest	92630	Orange	189
	1324 W. Sycamore Street	Willows	95988	Glenn	49
	9972 Juniper Avenue	Fontana	92335-6644	San Bernardino	63
	621 East Avenue I	Lancaster	93535	Los Angeles	91
	14900 Arlette Drive	Victorville	92394	San Bernardino	101
	1150 North Willow Ave	Rialto	92376	San Bernardino	100
	43331 30th Street West	Lancaster	93536	Los Angeles	61
	45151 Fern Avenue	Lancaster	83534	Los Angeles	76
	107 Avendia Serra	San Clemente	92673	Orange	19
	7807 Juniper Avenue	Fontana	92336	San Bernardino	55
	1400 San Leandro Boulevard	San Leandro	94577	Alameda	115
	55 Laguna Street	San Francisco	94102	San Francisco	40
	555 Main Street	Morro Bay	93442	San Luis Obispo	21
	9997 Feron Blvd.	Rancho Cucamong	91730	San Bernardino	88
	Rohnerville Rd and Smith Lane	Fortuna	95540	Humboldt	25
	360 Silver Bend Way	Auburn	95603	Placer	64
	990 E. Springfield Avenue	Reedley	93654	Fresno	76
	547 Lewis Avenue	San Andreas	95249	Calaveras	30
	Tache Way at Warthan Street	Coalinga	93210	Fresno	81
	Ramona Boulevard and Maine	Baldwin Park	91706	Los Angeles	70
	3005 E. Main Street	Ventura	93003	Ventura	40
	2100 Hoover Avenue	National City	91950	San Diego	109
	Foster City Boulevard at Balcl	Foster City	94404	San Mateo	66
	1758 Laurel Avenue	Solvang	93463	Santa Barbara	45
	North Avenue and J Street	Sanger	93657	Fresno	45
	114 12th Street	Greenfield	93927	Monterey	32
	Newcomb St & Henderson Av	Porterville	93257	Tulare	80
	625 Rembrandt Street	Bakersfield	93306	Kern	34
	3215 3rd Street	Long Beach	90814	Los Angeles	25
	W. Palmer and S. Siskiyou	Huron	93234	Fresno	25
	2352 Meadow Way	Santa Rosa	95404	Sonoma	52

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	280 E Street	Arcata	95521	Humboldt	32
	3201 Pine Street	Paso Robles	93446	San Luis Obispo	70
	Stanton Avenue & Orangethor	Buena Park	90621	Orange	70
	700 Idyllwind Drive	San Jacinto	92583	Riverside	38
	1251 Palomares Avenue	La Verne	91750	Los Angeles	36
	313 South Street	San Luis Obispo	93401	San Luis Obispo	43
	620 E. Maude Avenue	Sunnyvale	94085	Santa Clara	58
	605 Willow Road	Menlo Park	94025	San Mateo	60
	156 East Saint John Street	San Jose	95112-5510	Santa Clara	102
	592 Grand Ave	San Marcos	92078	San Diego	65
	942 W. Holt Avenue	Pomona	91768	Los Angeles	62
	360 Sutton Way	Grass Valley	95945	Nevada	78
	639 West Worth Street	Stockton	95206	San Joaquin	31
	1110 Jackson Street	Oakland	94607	Alameda	71
	17310 Hwy 12	Sonoma	95476	Sonoma	60
	3937 Iowa Street	San Diego	92104	San Diego	120
	1453 Fourth Avenue	San Diego	92101	San Diego	100
	18028 Valley Boulevard	Bloomington	92316	San Bernardino	106
	1555 South Avenue	Orange Cove	93646	Fresno	188
	7975 Sherwood Blvd.	Los Molinos	96055	Tehama	35
	825 Delta Lane	West Sacramento	95691	Yolo	77
	Moon Lane and Hwy 96	Hoopa	95546	Humboldt	12
	1625 San Carlos Street	Selma	93662	Fresno	48
	400 Morgan Street	Winters	95694	Yolo	38
	Refugio Road and Mission Drive	Santa Ynez	93460	Santa Barbara	60
	236 S Ramona Ave	Monterey Park	91754	Los Angeles	31
	534 N Chandler Ave	Monterey Park	91754	Los Angeles	
	321 E Pomona Blvd	Monterey Park	91754	Los Angeles	
	Refugio Road and Mission Drive	Santa Ynez	93460	Santa Barbara	27
	41152 Fremont Boulevard	Fremont	94538	Alameda	64
	134 E. Rossi Street	Salinas	93901	Monterey	41
	755 Luther Road	Red Bluff	96080	Tehama	89
	855 Luther Road	Red Bluff	96080	Tehama	
	800 Jasper Place	Yreka	96067	Siskiyou	55
	Badger St and Orlando Ave	Lost Hills	93249	Kern	81
	2901 Riverpark Boulevard	Oxnard	93036	Ventura	53
	22744 Eastpark Drive	Yorba Linda	92885	Orange	69
	Valencia Avenue and E. 9th St	San Bernardino	92410	San Bernardino	76
	1500 Page Street	San Francisco	94117-2018	San Francisco	17
	15888 Hesperian Blvd.	San Lorenzo	94580	Alameda	77
	512 E. Weber Ave	Stockton	95202	San Joaquin	40
	541 N. Fulton St	Fresno	93728	Fresno	45
	4532 E. Hamilton Ave	Fresno	93702	Fresno	
	1101 Main Street	Half Moon Bay	94109	San Mateo	36
	720 Fifth Avenue Court	Monrovia	91016-3176	Los Angeles	115
	1120 San Ysidro Blvd	San Ysidro	92101	San Diego	161
	1855 9th St.	Santa Monica	90404	Los Angeles	41
	1444 14th St.	Santa Monica	90404	Los Angeles	
	2006 20th St.	Santa Monica	90404	Los Angeles	
	658 S. Ferris Ave.	Los Angeles	90022	Los Angeles	21
	16000 Villa Yorba Lane	Huntington Beach	92647	Orange	198
	721 Bay Street	Santa Cruz	95060	Santa Cruz	94
	960 Triangle Court	Richmond	94801	Contra Costa	156
	568 Stege Avenue	Richmond	94804	Contra Costa	
	3590 19th Street	San Francisco	94110	San Francisco	50
	3298 25th Street	San Francisco	94110	San Francisco	
	220 N. Glenwood Avenue	Rialto	92376	San Bernardino	144
	2148 Jasmine Street	Delano	93215	Kern	90
	2516 W. 1st St.	Santa Ana	92703	Orange	54
	1239 Turk Street	San Francisco	94115	San Francisco	98
	261 East Alaska Avenue	Fairfield	94533	Solano	92
	390 E. Leland Rd	Pittsburg	94565	Contra Costa	145
	298 West Chanslor Avenue	Richmond	94801	Contra Costa	100
	321 S Calle El Segundo	Palm Springs	92262	Riverside	76
	1303 S Street	Bakersfield	93301	Kern	62
	280 Beale Street	San Francisco	94105-1902	San Francisco	70
	20 Harbour Way	Richmond	94801	Contra Costa	62
	2662 First Street	Napa	94558	Napa	41

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	6105 Sunset Boulevard	Rocklin	95677	Placer	67
	205 Canyon Court	Colfax	95713	Placer	67
	2360 Samaritan Place	San Jose	95124	Santa Clara	153
	7025 Friends Ave.	Whittier	90602	Los Angeles	75
	1384 Katherine Road South	Simi Valley	93063	Ventura	31
	345 E. Commonwealth Avenue	Fullerton	92832	Orange	95
	2175 Market Street	San Francisco	94114	San Francisco	19
	32101 McCoy Road	Soledad	93960	Monterey	44
	5600 Cottle Rd	San Jose	95112	Santa Clara	200
	Lexington Avenue and Great C	San Jose	95112	Santa Clara	134
	112 Middle Point Road	San Francisco	94124	San Francisco	107
	1310 Royal Oaks Drive	Duarte	91010	Los Angeles	75
	1260 Third Avenue	Chula Vista	91911	San Diego	100
	971 Forselles Way	Hayward	94544	Alameda	62
	786 Kawana Springs Road	Santa Rosa	95404	Sonoma	66
	1665 Aston Avenue	Santa Rosa	95404	Sonoma	
	350 Friedell Street	San Francisco	94124	San Francisco	60
	Avila Avenue and Parlier Aven	Parlier	93648	Fresno	24
	100 Ridge Valley Drive	Irvine	92618	Orange	221
	1009 Howard Street	San Francisco	94103	San Francisco	67
	327 Willie James Jones Avenu	San Diego	92102	San Diego	32
	4339 Elizabeth Street	Cudahy	90201	Los Angeles	100
	961 Sharmon Palms Lane	Campbell	95008	Santa Clara	60
	1730 Third Avenue	San Diego	92101	San Diego	152
	250 North Pacific Ave.	Orcutt	93455	Santa Barbara	16
	5575 Armitos Avenue	Goleta	93117	Santa Barbara	14
	370 Mathilda Drive	Goleta	93117	Santa Barbara	68
	1055 9th Avenue	San Diego	92101	San Diego	156
	300 Burton Mesa Boulevard	Lompoc	93436	Santa Barbara	80
	360 Meridian Ave	San Jose	95126	Santa Clara	90
	355 Race Street	San Jose	95126	Santa Clara	140
	18400 Tuolumne Road	Tuolumne	95379	Tuolumne	52
	193 Heritage Lane	Dixon	95620	Solano	60
	9915 Maple Park	Live Oak	95953	Sutter	35
	1900 Poco Way	San Jose	95116	Santa Clara	130
	1150 Webster Street	San Francisco	94115	San Francisco	68
	990 College Ave	St. Helena	94574	Napa	80
	2361 Bass Lake Road	Cameron Park	95682	El Dorado	88
	16576 Sultana Street	Hesperia	92345	San Bernardino	89
	150 South 19th Avenue	Lemoore	93245	Kings	80
	2600 Arelious Walker Drive	San Francisco	94121	San Francisco	93
	433 Aida Way	South San Francisc	94080	San Mateo	179
	1079 Johnson Drive	Ventura	93003	Ventura	101
	9620 Telephone Road	Ventura	93004	Ventura	
	1635 Tremont Drive	Santa Cruz	95062	Santa Cruz	76
	2700 Arelious Walker Drive	San Francisco	94121	San Francisco	91
	1355 Callen Street	Vacaville	95688	Solano	66
	6000 Carmel Valley Road	San Diego	92130	San Diego	107
	105 Avenida Presidio	San Clemente	92672	Orange	72
	628 Mikkelsen Drive	Auburn	95603	Placer	50
	649 Pilgrim Terrace Drive	Santa Barbara	93101	Santa Barbara	84
	14135 Cerise Avenue	Hawthorne	90250	Los Angeles	127
	Carmel Valley Rd and Clarkvie	San Diego	92130	San Diego	96
	1453 Fourth Avenue	San Diego	92101	San Diego	105
	6000 Carmel Valley Road	San Diego	92130	San Diego	90
	NW corner of Grand Avenue a	San Marcos	92078	San Diego	42
	500 I.O.O.F. Avenue	Gilroy	95020	Santa Clara	111
	1451 Atlantic Ave	Long Beach	90813	Los Angeles	75
	N Belmont Road & Fairway Dr	Exeter	93221	Tulare	25
	2000 River Avenue	Long Beach	90810	Los Angeles	120
	N. Highland Street and W. Wrr	Visalia	93291	Tulare	36
	9400 International Blvd	Oakland	94603	Alameda	59
	900 W. Pleasant Avenue	Tulare	93274	Tulare	40
	377 W Mt. Diablo Ave	Tracy	95376	San Joaquin	37
	5358 Carrington Circle	Stockton	95210	San Joaquin	60
	1105 Tulare Street	Parlier	93648	Fresno	41
	394 Wallis Avenue	Gustine	95322	Merced	34
	801 Lyons Bald Mountain Road	Sonora	95370	Tuolumne	42

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	1675 First Street	Lincoln	95648	Placer	44
	1233 G Street	Reedley	93654	Fresno	55
	7302 Santa Monica Boulevard	West Hollywood	90046	Los Angeles	77
	12701 S. Willowbrook Ave.	Compton	90222	Los Angeles	61
	2250 Walnut Avenue	Fresno	93706	Fresno	64
	144 Mun Kwok Ln	Stockton	95202	San Joaquin	112
	1435 Imperial Ave.	San Diego	92101	San Diego	63
	O Street & 13th Street	Arcata	95521	Humboldt	18
	1264 P Street	Firebaugh	93622	Fresno	30
	116 East Baker Street	Winters	95694	Yolo	44
	890 Buena Vista Road	Hollister	95023	San Benito	41
	3135 Harper Street	Berkeley	94703	Alameda	42
	3901 Briggs Street	Jurupa Valley	92509	Riverside	39
	112 Middle Point Road	San Francisco	94124	San Francisco	72
	1545 Rosemarie Lane	Stockton	95207	San Joaquin	82
	7306 Marbrisa Ave	Huntington Park	90255	Los Angeles	36
	7301 Santa Fe Ave	Huntington Park	90255	Los Angeles	
	5003 Imperial Avenue	San Diego	92113	San Diego	45
	Ida Street & N Street	Live Oak	95953	Sutter	56
	1500 E Hill St	Signal Hill	90755	Los Angeles	72
	600 S. Dudley Street	Pomona	91766	Los Angeles	84
	575 Mobley Lane	Hemet	92543	Riverside	41
	2358 University Avenue	East Palo Alto	94303	San Mateo	41
	22701 Davidson Drive	San Joaquin	93660	Fresno	70
	100 Healdsburg Avenue	Cloverdale	95425	Sonoma	32
	6215 Ocotillo Avenue	Twentynine Palms	92277	San Bernardino	65
	999 West El Monte Way	Dinuba	93618	Tulare	40
	979 Cherry Avenue	Beaumont	92223	Riverside	30
	1832 Apsuun	Yreka	96097	Siskiyou	30
	6800 Mission Street	Daly City	94014	San Mateo	52
	Butterfield Blvd. and Barrett A	Morgan Hill	95037	Santa Clara	114
	2490 Richmond		94806	Contra Costa	401
	100 Amelia Court	Oxnard	93030	Ventura	144
	1166 N. Escondido Blvd	Escondido	92026	San Diego	44
	550 24th Street	Oakland	94612	Alameda	201
	1500 Marina Vista	San Mateo	94404	San Mateo	92
	425 South Oleander Ave.	Compton	90220	Los Angeles	135
	460 East Washington Avenue	Escondido	92026	San Diego	91
	555 Crespi Drive	Pacifica	94044	San Mateo	100
	1227 Hampshire Street	San Francisco	94110	San Francisco	50
	712 Sycamore Lane	Petaluma	94952	Sonoma	23
	109 Magnolia Avenue	Petaluma	94952	Sonoma	90
	588 Mission Bay Boulevard N	San Francisco	94158	San Francisco	200
	Irvine Blvd & Pusan Way	Irvine	92618	Orange	256
	10960 Oakview Drive	Hanford	93230	Kings	88
	E. Davis Drive & N. Crawford A	Dinuba	93618	Tulare	44
	782 A Street	Hayward	94541	Alameda	60
	200 South Market Street	San Jose	95113	Santa Clara	165
	3333 Pacific Place	Long Beach	90806	Los Angeles	296
	800 Presido Avenue	San Francisco	94115	San Francisco	50
	12279 3rd Street	Yucaipa	92399	San Bernardino	50
	815 N Harbor Blvd	Santa Ana	92703	Orange	70
	3314 W. Beverly Blvd	Los Angeles	90004	Los Angeles	40
	4981 Market Street	San Diego	92102	San Diego	52
	Satterfield Way & Notre Dame	Chino	91710	San Bernardino	200
	1148 N. Lemon Street	Orange	92867	Orange	82
	1662 Rory Lane	Simi Valley	93063	Ventura	69
	Spring Oak Road	Camarillo	93010	Ventura	60
	10882 Stanford Avenue	Garden Grove	92840	Orange	47
	615 E. Virginia Way	Barstow	92311	San Bernardino	76
	15 Liberty	Aliso Viejo	92656	Orange	202
	2317 West Avenue J-8	Lancaster	93536	Los Angeles	77
	260 North Midway Drive	Escondido	92027	San Diego	200
	4370 Mayberry Street	San Diego	92113	San Diego	70
	131 South Kellogg	Goleta	93117	Santa Barbara	83
	1276 Oak Avenue	Greenfield	93927	Monterey	48
	200 East 10th Street	Gilroy	95020	Santa Clara	262
	N Street and 5th Street	March Air Force B	92518	Riverside	138

APPENDIX B
AB 693 - LIHTC QUALIFIED MULTIFAMILY PROPERTIES

Property Name	Address	City	Zip	County	Total Units
	60 North Third Street	San Jose	95112	Santa Clara	216
	1235 North Highland Avenue	Duarte	91010	Los Angeles	42
	5819 Riverside Drive	Chino	91710-4467	San Bernardino	40
	420 Sands Drive	San Jose	95125	Santa Clara	112
	6707 Golden Gate Drive	Dublin	94568	Alameda	66
	1769 Goss Street	Oakland	94607	Alameda	114
	2555 International Blvd.	Oakland	94601	Alameda	
	9550 Oak Street	Bellflower	90706	Los Angeles	144

APPENDIX C
AB 693 - HUD-ASSISTED QUALIFIED MULTIFAMILY PROPERTIES

<u>Property Name</u>	<u>Address</u>	<u>City</u>	<u>Zip</u>	<u>County</u>	<u>Total Units</u>
	15 NORTH THIRD STREET	ALHAMBRA	91801	Los Angeles	75
	89 S. Chapel Avenue	Alhambra	91801	Los Angeles	67
	2691 North Lincoln Ave	ALTADENA	91001	Los Angeles	25
	1400 A ST	ANTIOCH	94509	Contra Costa	50
	3420 Deer Valley Rd	Antioch	94531	Contra Costa	65
	1860 VIA PACIFICA	APTOS	95003	Santa Cruz	80
	901 GAIL AVE	ARBUCKLE	95912	Colusa	50
	655 W NAOMI AVE	ARCADIA	91007	Los Angeles	101
	2575 ALLIANCE RD	ARCATA	95521	Humboldt	135
	1061 HALLEN DR	ARCATA	95521	Humboldt	40
	365 S ELM ST	ARROYO GRANI	93420	San Luis Obispo	61
	112 RICHARD ST	ARVIN	93203	Kern	60
	1501 BEAR MOUNTAIN BLVD	ARVIN	93203	Kern	57
	701 Auburn Ravine Rd	Auburn	95603	Placer	50
	750 AUBURN RAVINE RD	AUBURN	95603	Placer	158
	535 Sacramento Street	Auburn	95603	Placer	60
	600 AUBURN RAVINE RD	AUBURN	95603	Placer	60
	222 GOODMAN ST	BAKERSFIELD	93305	Kern	12
	4948 BUCKLEY WAY	BAKERSFIELD	93309	Kern	20
	500 R St	Bakersfield	93304	Kern	80
	815 Decatur	BAKERSFIELD	93308	Kern	25
	414 REAL RD	BAKERSFIELD	93309	Kern	16
	600 FAIRFAX RD	BAKERSFIELD	93306	Kern	85
	2701 South Real Road				
	Apartment No. 1	BAKERSFIELD	93309	Kern	20
	6300 SUMMERFIELD DR	BAKERSFIELD	93313	Kern	18
	6000 WHITE LN	BAKERSFIELD	93309	Kern	60
	2601 SUNNY LN	BAKERSFIELD	93305	Kern	40
	14315 CLARK ST	BALDWIN PARK	91706	Los Angeles	78
	3243 Frazier St	BALDWIN PARK	91706	Los Angeles	60
	13870 RAMONA BLVD	BALDWIN PARK	91706	Los Angeles	49
	12728 Torch St	Baldwin Park	91706	Los Angeles	36
	3834 MONTEREY AV	BALDWIN PARK	91706	Los Angeles	75
	14442 E PACIFIC AVE	BALDWIN PARK	91706	Los Angeles	75
	615 E VIRGINIA WAY	BARSTOW	92311	San Bernardino	76
	752 PENNSYLVANIA AV	BEAUMONT	92223	Riverside	50
	6719 WOODWARD	BELL	90201	Los Angeles	4
	4324 FLORENCE AVE	BELL	90201	Los Angeles	72
	6850 FLORENCE AVE	BELL GARDENS	90201	Los Angeles	74
	9550 E OAK ST	BELLFLOWER	90706	Los Angeles	144
	9560 Oak St	Bellflower	90706	Los Angeles	26
	2400 CARLMONT DR	BELMONT	94002	San Mateo	164
	825 OLD COUNTY RD	BELMONT	94002	San Mateo	24
	1910 Hearst ST	BERKELEY	94709	Alameda	12
	2501 SACRAMENTO STREET	BERKELEY	94704	Alameda	16
	2577 San Pablo Avenue	BERKELEY	94704	Alameda	28
	1909 CEDAR ST	BERKELEY	94709	Alameda	46
	1499 ALCATRAZ AVENUE	BERKELEY	94702	Alameda	40
	819 Hearst Avenue	BERKELEY	94710	Alameda	62
	2951 DERBY ST	BERKELEY	94705	Alameda	169
	1431-33 OXFORD STREET	BERKELEY	94709	Alameda	10
	1617 RUSSELL ST	BERKELEY	94703	Alameda	35
	2017 STUART ST	BERKELEY	94703	Alameda	57
	1320 ADDISON ST	BERKELEY	94702	Alameda	150
	1471 ADDISON	BERKELEY	94702	Alameda	48
	225 N CRESCENT DR	BEVERLY HILLS	90210	Los Angeles	151
	18167 MINDANAO ST	BLOOMINGTON	92316	San Bernardino	4
	10656 MAPLE ST	BLOOMINGTON	92316	San Bernardino	4
	18169 GREGORY STREET	BLOOMINGTON	92316	San Bernardino	3
	161 Sycamore Avenue	BRENTWOOD	94513	Contra Costa	40
	7551 ORANGETHORPE AVE	BUENA PARK	90621	Orange	100
	8361 KNOTT AVE	BUENA PARK	90620	Orange	11
	2105 E PONDEROSA DR	CAMARILLO	93010	Ventura	91
	1700-1760 LEWIS RD	CAMARILLO	93011	Ventura	24
	250 BUDD AVE	CAMPBELL	95008	Santa Clara	102
	825 S San Tomas Aquino Road	CAMPBELL	95008	Santa Clara	100
	1655 WINCHESTER BOULEVARD	CAMPBELL	95008	Santa Clara	156
	3245 Clares St	Capitola	95010	Santa Cruz	25

APPENDIX C
AB 693 - HUD-ASSISTED QUALIFIED MULTIFAMILY PROPERTIES

<u>Property Name</u>	<u>Address</u>	<u>City</u>	<u>Zip</u>	<u>County</u>	<u>Total Units</u>
	6205 Alverton Dr	Carlsbad	92009	San Diego	6
	648 MAPLE ST	CARPINTERIA	93013	Santa Barbara	6
	21811 SO. MAIN ST	CARSON	90745	Los Angeles	101
	22222-28 GRACE AVE				
	bldg A,B,C,D	CARSON	90745	LOS ANGELES	38
	34445 CORREGIDOR DR	CATHEDRAL CIT	92234	RIVERSIDE	50
	820 WEST 4TH AVE	CHICO	95926	Butte	116
	1650 FOREST AVE	CHICO	95928	Butte	80
	2058 HARTFORD DR	CHICO	95928	Butte	20
	2001 Notre Dame Blvd.	Chico	95928	Butte	50
	120 PARMAC RD	CHICO	95926	Butte	38
	25 VIA LA PAZ	CHICO	95928	Butte	24
	650 MANZANITA AVE	CHICO	95926	Butte	59
	377 Rio Lindo Avenue	Chico	95926	Butte	10
	12855 OAKS AVE	CHINO	91710	San Bernardino	84
	5819 RIVERSIDE DR	CHINO	91710	San Bernardino	40
	900 HOSPITAL DR	CHOWCHILLA	93610	Madera	45
	1260 3RD AVE	CHULA VISTA	91911	San Diego	100
	636 3RD AVE	CHULA VISTA	91910	San Diego	75
	1730 N Towne Ave	Claremont	91711	Los Angeles	23
	1732 Kirker Pass Rd	Clayton	94517	Contra Costa	20
	6215 OLD HIGHWAY 53	CLEARLAKE	95422	Lake	40
	75 Lake Street	Clearlake Oaks	95423	Lake	23
	51 Barstow Avenue	CLOVIS	93612	Fresno	75
	101 Barstow Avenue	Clovis	93612	Fresno	60
	141 S 3rd St Apt 127	Coalinga	93210	Fresno	52
	500 PACIFIC ST	COALINGA	93210	Fresno	65
	301 W Polk ST	COALINGA	93210	Fresno	102
	205 CANYON VIEW RD	COLFAX	95713	Placer	67
	85 REINER ST	COLMA	94014	San Mateo	20
	1431 WESCOTT RD	COLUSA	95932	Colusa	30
	232 E Carson St	Colusa	95932	Colusa	30
	6201 EMIL AVE	COMMERCE	90040	Los Angeles	10
	6725 E GAGE AVE	COMMERCE	90040	Los Angeles	68
	7010 WATCHER ST	COMMERCE	90040	LOS ANGELES	4
	7131 Gage ST	COMMERCE	90040	Los Angeles	24
	7100 E GAGE AVE	COMMERCE	90040	Los Angeles	75
	1101 N CENTRAL AVE	COMPTON	90222	Los Angeles	50
	700 W LAUREL ST. A210	COMPTON	90221	Los Angeles	164
	1935 E 122ND ST	COMPTON	90222	Los Angeles	60
	1001 W CRESSEY ST	COMPTON	90220	Los Angeles	75
	425 SO OLEANDER AVE	COMPTON	90220	Los Angeles	114
	415 SOUTH OLEANDER AVE	COMPTON	90220	Los Angeles	21
	12600 S COMPTON AVE	COMPTON	90222	Los Angeles	40
	2401 Bonificio Street	CONCORD	94520	Contra Costa	12
	4455 Melody Dr	Concord	94521	Contra Costa	80
	2141 CALIFORNIA ST	CONCORD	94520	Contra Costa	20
	2222 PACHECO BLVD	CONCORD	94520	Contra Costa	196
	651 TOOMES AVE	CORNING	96021	Tehama	80
	910 S Belle Ave	Corona	92882	Riverside	36
	2680 South Main Street	CORONA	92882	RIVERSIDE	75
	779 FORD STREET	CORONA	92879	RIVERSIDE	7
	1275 W 8th St	Corona	92882	Riverside	40
	2800 PACIFIC VIEW DR	CORONA DEL M	92625	Orange	100
	678 W . 19 Street	COSTA MESA	92627	Orange	270
	1840 PARK AVE	COSTA MESA	92627	Orange	75
	42 CHARLES STREET	COTATI	94931	Sonoma	48
	770 E COTATI AVE	COTATI	94931	Sonoma	37
	298 E COTATI AVE	COTATI	94931	Sonoma	28
	19525 COVINA BLVD	COVINA	91724	Los Angeles	44
	20420 E ARROW HWY	COVINA	91724	Los Angeles	96
	1755 NORTHCREST DR	CRESCENT CITY	95531	Del Norte	40
	1212 Wanda St	Crockett	94525	Contra Costa	36
	4222 Van Buren Pl	Culver City	90232	Los Angeles	13
	3434 Caroline Avenue	CULVER CITY	90232	Los Angeles	3
	5100 OVERLAND AVE	CULVER CITY	90230	Los Angeles	100
	5168 SEPULVEDA BLVD	CULVER CITY	90230	Los Angeles	48
	4215 KEYSTONE AVE	CULVER CITY	90232	Los Angeles	6

APPENDIX C
AB 693 - HUD-ASSISTED QUALIFIED MULTIFAMILY PROPERTIES

<u>Property Name</u>	<u>Address</u>	<u>City</u>	<u>Zip</u>	<u>County</u>	<u>Total Units</u>
	5901 GREENVALLEY CIRCLE FOXHILLS PINES				
	no.465	CULVER CITY	90230	LOS ANGELES	4
	6151 CANTERBURY DR. # 206	CULVER CITY	90230	Los Angeles	8
	6000 CANTERBURY DR, #D103; ET AL	CULVER CITY	90230	Los Angeles	8
	6151 CANTERBURY	CULVER CITY	90230	Los Angeles	8
	10092 Bianchi WAY	CUPERTINO	95014	Santa Clara	27
	22449 CUPERTINO RD	CUPERTINO	95014	Santa Clara	100
	35 Hillcrest Dr	Daly City	94014	San Mateo	39
	2070 Sullivan Ave	Daly City	94015	San Mateo	50
	50 E Market St Bldg B	Daly City	94014	San Mateo	120
	326 Becerra Way	Davis	95618	Yolo	21
	2525 E 8TH ST	DAVIS	95616	Yolo	15
	1221 KENNEDY PL	DAVIS	95616	Yolo	70
	1501 Shasta Dr	Davis	95616	Yolo	68
	2033 F ST	DAVIS	95616	Yolo	95
	1635 RANDOLPH ST	DELANO	93215	Kern	43
	302 GARCES HWY	DELANO	93215	Kern	76
	4015 Panther Ln	Diamond Spring	95619	El Dorado	16
	1051 N Eaton AVE	DINUBA	93618	Tulare	40
	1300 WEST H ST	DIXON	95620	Solano	95
	1730 Huntington Dr	Duarte	91010	Los Angeles	80
	Huntington Drive	Duarte	91010	Los Angeles	0
	1901 BUENA VISTA ST	DUARTE	91010	Los Angeles	101
	1235 N. HIGHLAND AVE	DUARTE	91010	Los Angeles	42
	1310 ROYAL OAKS DR	DUARTE	91010	Los Angeles	75
	1562 E MAIN ST	EL CAJON	92021	San Diego	160
	1562 E Main Street	EL CAJON	92021	San Diego	52
	180 BALLANTYNE ST	EL CAJON	92020	San Diego	88
	175 S ANZA ST	EL CAJON	92020	San Diego	75
	1350 Teton Drive	El Cajon	92021	San Diego	6
	11025 SAN PABLO AVE	EL CERRITO	94530	Contra Costa	63
	3436 N TYLER AVE	EL MONTE	91731	Los Angeles	70
	3843-49 MAXSON RD	EL MONTE	91732	LOS ANGELES	71
	11905 FERRIS RD	EL MONTE	91732	Los Angeles	70
	462 Corte Arango	El Sobrante	94803	Contra Costa	9
	5038 San Pablo Dam RD	EL SOBRANTE	94803	Contra Costa	57
	4630 APPIAN WAY	EL SOBRANTE	94803	Contra Costa	50
	1034 - 36TH STREET	EMERYVILLE	94608	Alameda	6
	4320 SAN PABLO AVE	EMERYVILLE	94608	Alameda	50
	645 Via Cantebría	Encinitas	92024	SAN DIEGO	44
	620 MELBA RD				
	APT. 24	ENCINITAS	92024	San Diego	30
	500 N MIDWAY DR	ESCONDIDO	92027	San Diego	92
	1301 LAS VILLAS WAY	ESCONDIDO	92026	San Diego	75
	333 E ST	EUREKA	95501	Humboldt	36
	2141 TYDD ST	EUREKA	95501	Humboldt	152
	53 TAYLOR DR	FAIRFAX	94930	Marin	70
	2401 Sir Francis Drake BLVD	FAIRFAX	94930	Marin	12
	261 E ALASKA AVE	FAIRFIELD	94533	Solano	92
	1650 Park LN	FAIRFIELD	94533	Solano	64
	188 E ALASKA AVE	FAIRFIELD	94533	Solano	100
	693 E Tabor Ave	Fairfield	94533	Solano	64
	528 De Luz Road	FALLBROOK	92028	San Diego	32
	1262 Via Encinos Drive	FALLBROOK	92028	San Diego	7
	16707 MARYGOLD AVE	FONTANA	92335	San Bernardino	151
	9962,9972,9988 Juniper Avenue	Fontana	92335	San Bernardino	0
	9971 Juniper Avenue	Fontana	92235	San Bernardino	60
	7222 SIERRA AVE	FONTANA	92336	San Bernardino	80
	520 CYPRESS ST	FORT BRAGG	95437	Mendocino	42
	2130 Smith Lane				
	#24	FORTUNA	95540	Humboldt	48
	2321 NEWBERG RD	FORTUNA	95540	Humboldt	30
	17103 MAGNOLIA ST	FOUNTAIN VALI	92708	Orange	71
	1955 Pajaro	FREEDOM	95019	Santa Cruz	106
	1335 MOWRY AVE	FREMONT	94538	Alameda	32
	40852 Lincoln Street	Fremont	94538	Alameda	14
	41247 ROBERTS AVE	FREMONT	94538	Alameda	20

APPENDIX C
AB 693 - HUD-ASSISTED QUALIFIED MULTIFAMILY PROPERTIES

<u>Property Name</u>	<u>Address</u>	<u>City</u>	<u>Zip</u>	<u>County</u>	<u>Total Units</u>
	39548 FREMONT BLVD	FREMONT	94538	Alameda	94
	3939 MONROE AVE	FREMONT	94536	Alameda	128
	3599 PENNSYLVANIA AVE	FREMONT	94536	Alameda	60
	4830 E Laurel Ave	Fresno	93727	Fresno	19
	4327 Cedar	FRESNO	93726	Fresno	146
	4825 E Fillmore ST	FRESNO	93727	Fresno	90
	1480 N DELNO ST	FRESNO	93728	Fresno	61
	4851 N CEDAR AVE	FRESNO	93726	Fresno	100
	2530 W Fountain Way	FRESNO	93705	Fresno	72
	3726 N PLEASANT AVE	FRESNO	93705	Fresno	51
	530 W. FLORADORA AVE	FRESNO	93728	Fresno	149
	720 W HAWES AVE	FRESNO	93706	Fresno	150
	5271 E KINGS CANYON RD	FRESNO	93727	Fresno	74
	855 E LORENA ST	FRESNO	93706	Fresno	46
	1240 BROADWAY PLZ	FRESNO	93721	Fresno	206
	7077 N MILLBROOK AVE	FRESNO	93720	Fresno	75
	3513 N PLEASANT AVE	FRESNO	93705	Fresno	60
	North Marty Avenue	Fresno	93711	Fresno	80
	5125 N. Marty Avenue	Fresno	93711	Fresno	80
	1824 FULTON ST	FRESNO	93721	Fresno	158
	4430 E. Hamilton	Fresno	93727	Fresno	191
	5675 E BALCH AVE	FRESNO	93727	Fresno	74
	1717 S Winery Ave	Fresno	93727	Fresno	32
	4250 N Chestnut				
	4814 E Swift	Fresno	93726	Fresno	39
	343 W AMERIGE AVE	FULLERTON	92832	Orange	101
	2200 East Chapman Avenue	FULLERTON	92831	Orange	25
	2305 N HARBOR BLVD	FULLERTON	92835	Orange	25
	703 Cedar Street	GARBERVILLE	95542	Humboldt	10
	725 Cedar St	Garberville	95542	Humboldt	10
	10931 ACACIA PKWY	GARDEN GROV	92840	Orange	161
	11441 ACACIA PKY	GARDEN GROV	92840	Orange	65
	10632 BOLSA AVE	GARDEN GROV	92643	Orange	78
	15920 Casimir Avenue	GARDENA	90247	Los Angeles	3
	1715 W 158TH ST	GARDENA	90247	LOS ANGELES	80
	17100 S PARK LN	GARDENA	90247	Los Angeles	126
	17150 S PARK LN	GARDENA	90247	Los Angeles	74
	2010 W. El Segundo Blvd.	Gardena	90249	Los Angeles	37
	14722 LEMOLI AVE	GARDENA	90249	Los Angeles	28
	500 i.o.o.f AVE	GILROY	95020	Santa Clara	111
	181 Pierce Street	GILROY	95020	Santa Clara	54
	340 N Wabash Ave	GLENDORA	91741	Los Angeles	105
	6069 Shirrell Way	Goleta	93117	Santa Barbara	13
	5575-5595 Armitos Ave	Goleta	93117	Santa Barbara	14
	131 S KELLOGG AVENUE	GOLETA	93117	Santa Barbara	75
	701 Arnold Way	Half Moon Bay	94019	San Mateo	64
	1001 MAIN #107-S ST	HALF MOON B/	94019	San Mateo	50
	10960 Oakview Dr	Hanford	93230	Kings	41
	1030 North GREEN ST,Apt.G	HANFORD	93230	Kings	10
	13000 DOTY AVE	HAWTHORNE	90250	Los Angeles	75
	4536 W 118TH ST	HAWTHORNE	90250	Los Angeles	75
	27424 TAMPA AVE	HAYWARD	94544	Alameda	78
	26409 GADDING RD	HAYWARD	94544	Alameda	60
	21659 Montgomery ST	HAYWARD	94541	Alameda	50
	22650 ALICE ST	HAYWARD	94541	Alameda	26
	981 WEST TENNYSON RD	HAYWARD	94544	Alameda	96
	657 Bartlett AVE	HAYWARD	94541	Alameda	95
	713 BARTLETT AVE	HAYWARD	94541	Alameda	65
	1360 Acacia	Hemet	92544	Riverside	18
	465 N Palm Ave	Hemet	92543	Riverside	65
	1015 Oakland	Hemet	92543	Riverside	75
	3251 Highland Ave	Highland	92346	San Bernardino	90
	850 HILLCREST RD	HOLLISTER	95023	San Benito	116
	18765 Florida St	Huntington Bea	92648	Orange	185
	16000 VILLA YORBA LANE	HUNTINGTON I	92647	ORANGE	198
	36200 N. GIFFEN AVE.	HURON	93234		50
	1052 9TH ST	IMPERIAL BEAC	91932	San Diego	100
	811 N EUCALYPTUS AVE	INGLEWOOD	90302	Los Angeles	93

APPENDIX C
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<u>Property Name</u>	<u>Address</u>	<u>City</u>	<u>Zip</u>	<u>County</u>	<u>Total Units</u>
	510 CENTINELA AVE	INGLEWOOD	90302	Los Angeles	40
	508 Grace Avenue	Inglewood	90301	Los Angeles	5
	550 W REGENT, #115; ET AL	INGLEWOOD	90301	Los Angeles	4
	230 S GREVILLEA AVE	INGLEWOOD	90301	Los Angeles	40
	151 N LOCUST ST	INGLEWOOD	90301	Los Angeles	104
	14501 Harvard Ave	Irvine	92606	Orange	24
	3773 UNIVERSITY DR	IRVINE	92612	Orange	40
	50 Cornell Apt 21	Irvine	92612	Orange	161
	50 TAROCCO ST	IRVINE	92618	Orange	60
	4251 Margarita St	Irvine	92604	Orange	9
	1 MONROE	IRVINE	92620	Orange	121
	2 FLAGSTONE	IRVINE	92606	Orange	248
	1 Knollglen	Irvine	92614	Orange	120
	10 Thunder Run #30	Irvine	92614	Orange	258
	401 CLINTON RD	JACKSON	95642	Amador	30
	101 North Cypress	LA HABRA	90631	Orange	56
	900 LAS LOMAS DRIVE	LA HABRA	90631	Orange	112
	7410 CUVIER ST	LA JOLLA	92037	San Diego	8
	8070 Orange Ave	LA MESA	91941	San Diego	128
	5700 COWLES MOUNTAIN BLVD	LA MESA	91942	San Diego	218
	15622 AMAR RD	LA PUENTE	91746	LOS ANGELES	96
	17351 E MAIN ST	LA PUENTE	91744	Los Angeles	121
	775 NANTES AVE	LA PUENTE	91744	Los Angeles	40
	2400 SAN DIMAS CYN RD	LA VERNE	91750	Los Angeles	142
	3512 MORAGA BLVD	LAFAYETTE	94549	Contra Costa	67
	383 THIRD ST.	LAGUNA BEACH	92651	Orange	25
	21544 WESLEY DRIVE	LAGUNA BEACH	92651	Orange	71
	23681 CAMBRIDGE CIR	LAGUNA NIGUE	92677	Orange	56
	25952 VIA LOMAS	LAGUNA NIGUE	92653	Orange	51
	24275 Avenida Breve	LAGUNA NIGUE	92677	Orange	100
	958 Bevins St	Lakeport	95453	Lake	10
	525 BEVINS ST	LAKEPORT	95453	Lake	36
	2031 Giselman Street	LAKEPORT	95453	Lake	30
	10045 Anja Place	LAKESIDE	92040	San Diego	6
	10200 Aquilla Drive	LAKESIDE	92040	San Diego	6
	12219 ROBERTS WAY	LAKESIDE	92040	San Diego	85
	4051 E. CANDLEWOOD ST	LAKEWOOD	90712	Los Angeles	81
	8800 FAR HILLS AVE	LAMONT	93241	Kern	34
	10113 STOBAGH ST	LAMONT	93241	Kern	20
	3107 W Avenue K4	LANCASTER	93536	Los Angeles	120
	44916 N Tenth Street West	Lancaster	93534	Los Angeles	37
	45151 FERN AVE	LANCASTER	93534	Los Angeles	76
	711 W JACKMAN ST	LANCASTER	93534	Los Angeles	120
	6570 W AVENUE L-12	LANCASTER	93536	Los Angeles	76
	625 E Avenue I	LANCASTER	93535	Los Angeles	91
	1037 EAST AVENUE K	LANCASTER	93535	Los Angeles	155
	4702 W 153RD PL	LAWNDALE	90260	Los Angeles	56
	8150 BROADWAY	LEMON GROVE	91945	San Diego	100
	5938 LOWE AVE	LINDA	95901	Yuba	65
	9400 LARKIN RD	LIVE OAK	95953	Sutter	32
	1300 S. LIVERMORE AVENUE	LIVERMORE	94550	Alameda	80
	1140 Mocho St	Livermore	94550	Alameda	12
	Corner of Gardella Plaza & Hosker Lane				
	3330, 3338, 3376 Gardella Plaza	LIVERMORE	94550	Alameda	39
	550 HILLCREST AVE	LIVERMORE	94550	Alameda	55
	3700 PACIFIC AVE	LIVERMORE	94550	Alameda	75
	25109 EBONY LN	LOMITA	90717	Los Angeles	67
	3065 N GOLD STAR DR	LONG BEACH	90810	Los Angeles	348
	505 W 6TH ST	LONG BEACH	90802	Los Angeles	45
	2441 Belmont	LONG BEACH	90805	Los Angeles	6
	408 ELM AVE	LONG BEACH	90802	Los Angeles	24
	1324 Hellman Ave	LONG BEACH	90813	Los Angeles	4
	1030 Olive	LONG BEACH	90813	LOS ANGELES	3
	1430 E 17th St	LONG BEACH	90813	LOS ANGELES	3
	851 Martin Luther King	LONG BEACH	90813	LOS ANGELES	2
	600 E 4TH ST	LONG BEACH	90802	Los Angeles	100
	225 DEL AMO BLVD	LONG BEACH	90805	Los Angeles	230

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<u>Property Name</u>	<u>Address</u>	<u>City</u>	<u>Zip</u>	<u>County</u>	<u>Total Units</u>
	3801 East Willow Street	LONG BEACH	90815	Los Angeles	50
	2209-11 Clark Stteet	LONG BEACH	90815	LOS ANGELES	6
	575 E. Vernon Street	Long Beach	90806	Los Angeles	66
	2340 4TH ST	LONG BEACH	90814	Los Angeles	93
	1035 LEWIS AVE	LONG BEACH	90813	Los Angeles	20
	690 E PACIFIC COAST HWY	LONG BEACH	90806	Los Angeles	50
	714 Pacific Avenue	LONG BEACH	90813	Los Angeles	183
	4676 LONG BEACH BLVD.	LONG BEACH	90805	Los Angeles	58
	1451 ATLANTIC BLVD	LONG BEACH	90813	Los Angeles	75
	1120 ATLANTIC AVE	LONG BEACH	90813	Los Angeles	148
	4121 KATELLA AVE	LOS ALAMITOS	90720	Orange	71
	11015 BUDLONG AVE	LOS ANGELES	90044	Los Angeles	20
	9215 Hooper Avenue	LOS ANGELES	90002	Los Angeles	35
	1200 N FAIRFAX AVE	LOS ANGELES	90046	Los Angeles	151
	4000 Fairmount St	LOS ANGELES	90063	Los Angeles	109
	822 N Hazard Ave	LOS ANGELES	90063	Los Angeles	100
	3739 HUBBARD ST	LOS ANGELES	90023	Los Angeles	6
	337 N MEDNICK AVE	LOS ANGELES	90022	LOS ANGELES	51
	1212 W 110TH ST	LOS ANGELES	90044	Los Angeles	40
	10223 PARISE DR	LOS ANGELES	90614	LOS ANGELES	3
	717-721 E EL SEGUNDO BLVD	LOS ANGELES	90059	Los Angeles	33
	251 S ARIZONA ST	LOS ANGELES	90022	Los Angeles	75
	4704 DOZIER ST	LOS ANGELES	90022	Los Angeles	24
	6415 S. MAKEE ST	LOS ANGELES	90001	Los Angeles	54
	5860 E HIGHWAY 20	LUCERNE	95458	Lake	31
	1976 North Union Rd	MANTECA	95336	San Joaquin	50
	544 EASTWOOD AVE	MANTECA	95336	San Joaquin	84
	6 BUCKLEW ST	MARIN CITY	94965	Marin	48
	913 DRAKE AVE	MARIN CITY	94965	Marin	56
	3109 SEACREST AVE	MARINA	93933	Monterey	105
	3012-3032 Lexington Court	Marina	93933	Monterey	21
	326 WARD ST	MARTINEZ	94553	Contra Costa	32
	3441 SENTINEL	MARTINEZ	94553	Contra Costa	53
	3441 SENTINEL DR	MARTINEZ	94553	Contra Costa	54
	223 F ST	MARYSVILLE	95901	Yuba	100
	4646 SLAUSON AVE	MAYWOOD	90270	Los Angeles	55
	101 West Minnesota Ave	MCCLOUD	96057	Siskiyou	14
	101 Straw Street	Mendota	93640	Fresno	123
	1331 CRANE ST	MENLO PARK	94025	San Mateo	93
	15000 PACIFIC ST	MIDWAY CITY	92655	Orange	97
	260 CAMINO ALTO COURT,#1	MILL VALLEY	94941	Marin	24
	60 Camino Alto	MILL VALLEY	94941	Marin	10
	40 CAMINO ALTO	MILL VALLEY	94941	Marin	150
	1724 SUNNYHILLS DRIVE	MILPITAS	95035	Santa Clara	171
	1592 BARSTOW RD	MOJAVE	93501	Kern	52
	724 S MONTEREY AVE	MONROVIA	91016	Los Angeles	28
	525 E Walnut Ave	MONROVIA	91016	Los Angeles	12
	140 N MONTEBELLO BLVD	MONTEBELLO	90640	Los Angeles	130
	1405 S GREENWOOD AVE	MONTEBELLO	90640	Los Angeles	40
	345 DELA VINA AVE	MONTEREY	93940	Monterey	14
	151 Park AVE	MONTEREY	93940	Monterey	26
	20 DEL MONTE AVE	MONTEREY	93940	Monterey	64
	234 No. Rural Drive	MONTEREY PAF	91755	Los Angeles	120
	215 N Chandler Ave	MONTEREY PAF	91754	Los Angeles	125
	500 S McPherrin Ave	MONTEREY PAF	91754	Los Angeles	7
	322 E. Newmark Avenue	Monterey Park	91755	Los Angeles	7
	200 W. NEWMARK AV.	MONTEREY PAF	91754	Los Angeles	67
	24545 BAY AVE	MORENO VALLI	92553	Riverside	24
	24169 Eucalyptus Ave	Moreno Valley	92553	Riverside	69
	25105 FIR AVE	MORENO VALLI	92553	Riverside	75
	140 W DUNNE AVE	MORGAN HILL	95037	Santa Clara	20
	456 ELENA ST	MORRO BAY	93442	San Luis Obispo	40
	700 PINE ST	MOUNT SHASTA	96067	Siskiyou	28
	1020 KINGSTON ST	MOUNT SHASTA	96067	Siskiyou	39
	1020 KINGSTON RD	MOUNT SHASTA	96067	Siskiyou	24
	1020 KINGSTON RD	MOUNT SHASTA	96067	Siskiyou	10
	185 ROCKFELLOW DR	MOUNT SHASTA	96067	Siskiyou	6
	1198 Kingston Rd	Mount Shasta	96067	Siskiyou	11

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<u>Property Name</u>	<u>Address</u>	<u>City</u>	<u>Zip</u>	<u>County</u>	<u>Total Units</u>
	1020 Kingston Rd	Mount Shasta	96067	Siskiyou	11
	807 SAN VERON AVE	MOUNTAIN VIE	94043	Santa Clara	32
	1909 HACKETT AVE	MOUNTAIN VIE	94040	Santa Clara	34
	400 Fairview Dr.	NAPA	94559	Napa	6
	3400 Jefferson Street	NAPA	94558	Napa	78
	1300 JEFFERSON ST	NAPA	94559	Napa	84
	790 Lincoln AVE	NAPA	94558	Napa	140
	2009 Imola Ave	Napa	94559	Napa	19
	2700 E 8TH ST	NATIONAL CITY	91950	San Diego	180
	1415 D AVENUE	NATIONAL CITY	91950	San Diego	152
	650 E 14TH ST	NATIONAL CITY	91950	San Diego	75
	35322 CEDAR BLVD	NEWARK	94560	Alameda	50
	35300 CEDAR BLVD	NEWARK	94560	Alameda	150
	24624 APPLE ST	NEWHALL	91321	Los Angeles	6
	719 DRISKELL AVE	NEWMAN	95360	Stanislaus	48
	2680 Clark Ave	Norco	92860	Riverside	40
	11809 Los Alisos Cir	Norwalk	90650	Los Angeles	48
	11223 FERINA AVE	NORWALK	90650	Los Angeles	18
	1912 Novato Blvd	Novato	94947	Marin	6
	816 Lamont Avenue	Novato	94957	Marin	6
	626 Owens DR	NOVATO	94949	Marin	50
	6 Brown DR	NOVATO	94947	Marin	18
	1100 OLIVE AVE	NOVATO	94945	Marin	16
	2 Stonehaven CT	NOVATO	94947	Marin	6
	821 FILBERT ST	OAKLAND	94607	Alameda	25
	8135 INTERNATIONAL BLVD	OAKLAND	94621	Alameda	76
	1388 81ST AVE	OAKLAND	94621	Alameda	51
	10121 E 14TH ST	OAKLAND	94603	Alameda	49
	7607 INTERNATIONAL BOULEVARD	OAKLAND	94621	Alameda	24
	5636 Bancroft Avenue	OAKLAND	94605	Alameda	61
	3649 DIAMOND AVE	OAKLAND	94602	Alameda	50
	1100 MARKET ST	OAKLAND	94607	Alameda	54
	3850 COOLIDGE AVENUE	OAKLAND	94602	Alameda	19
	2611 ALVINGROOM CT	OAKLAND	94605	Alameda	54
	2787 79TH ST	OAKLAND	94605	Alameda	12
	6850 Foothill Blvd	OAKLAND	94605	Alameda	19
	275 E 12th St	Oakland	94606	Alameda	40
	1800 Linden St	Oakland	94607	Alameda	10
	270 Thirteenth ST	OAKLAND	94612	Alameda	315
	250 E. 12th Street	OAKLAND	94606	Alameda	40
	250 EAST 12TH ST	OAKLAND	94606	Alameda	80
	136 E 12th St	Oakland	94606	Alameda	66
	1223 - 37TH AVE	OAKLAND	94601	Alameda	68
	32 LINDA AVE	OAKLAND	94611	Alameda	42
	970 14th ST	OAKLAND	94607	Alameda	27
	550 24th ST	OAKLAND	94612	Alameda	201
	5375 MANILA AVE	OAKLAND	94618	Alameda	39
	1094 Alcatraz Ave	Oakland	94608	Alameda	44
	2221 FRUITVALE AVE	OAKLAND	94601	Alameda	100
	540 23RD ST	OAKLAND	94612	Alameda	41
	540 21ST ST	OAKLAND	94612	Alameda	352
	6400 San Pablo AVE	OAKLAND	94608	Alameda	55
	5815 Martin Luther King Jr Way	Oakland	94609	Alameda	88
	1501 ALICE ST	OAKLAND	94612	Alameda	130
	3250 SAN PABLO AVE	OAKLAND	94608	Alameda	60
	801 10TH ST	OAKLAND	94607	Alameda	101
	1212 CENTER ST	OAKLAND	94607	Alameda	66
	1143 10th St	Oakland	94607	Alameda	25
	280 28TH ST	OAKLAND	94611	Alameda	150
	269 VERNON ST	OAKLAND	94610	Alameda	13
	275 28TH ST	OAKLAND	94611	Alameda	200
	4991 GARDINIA AVENUE	OAKLEY	94561	Contra Costa	24
	115 S CLEMENTINE ST	OCEANSIDE	92054	San Diego	86
	Lake Blvd/College	Oceanside	92056	San Diego	79
	802 TOPEKA ST	OCEANSIDE	92054	San Diego	73
	4602 Allende Ave	Oceanside	92057	San Diego	6
	4520 N River Road	OCEANSIDE	92056	San Diego	56
	3839 LAKE BLVD	OCEANSIDE	92056	San Diego	69

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<u>Property Name</u>	<u>Address</u>	<u>City</u>	<u>Zip</u>	<u>County</u>	<u>Total Units</u>
	310 N CLEMENTINE ST	OCEANSIDE	92054	San Diego	11
	1449 E D St	Ontario	91764	San Bernardino	48
	1360 E D ST	ONTARIO	91764	San Bernardino	86
	207 W H ST	ONTARIO	91762	San Bernardino	100
	1740 E LA VETA AVE	ORANGE	92866	Orange	40
	451-53 N LEMON ST	ORANGE	92666	ORANGE	8
	555 S SHAFFER ST	ORANGE	92866	Orange	75
	250 N Pacific St	Orcutt	93455	Santa Barbara	15
	20 IRWIN WAY	ORINDA VILLAC	94563	Contra Costa	150
	1511 Robinson Street	Oroville	95695	Butte	50
	5th Street & Hobson Way	OXNARD	93030	VENTURA	41
	121 ASPEN DRIVE	PACHECO	94553	Contra Costa	12
	1060 TERRA NOVA BLVD	PACIFICA	94044	San Mateo	102
	903 Oceana Blvd	Pacifica	94044	San Mateo	42
	3200 E Baristo Rd	PALM SPRINGS	92262	Riverside	116
	303 S Calle Encilia	PALM SPRINGS	92262	Riverside	76
	2950 N Indian Canyon Dr	PALM SPRINGS	92262	Riverside	44
	1207 VISTA CHINO	PALM SPRINGS	92262	RIVERSIDE	52
	38633 E 10TH ST	PALMDALE	93550	Los Angeles	55
	37929 35TH ST E	PALMDALE	93550	Los Angeles	48
	37902 N 20TH ST E	PALMDALE	93550	Los Angeles	80
	38601 10th St E	Palmdale	93550	Los Angeles	76
	38040 11TH ST	PALMDALE	93550	Los Angeles	64
	547 EAST AVENUE Q-12	PALMDALE	93550	LOS ANGELES	8
	38941 STANRIDGE AVE	PALMDALE	93550	Los Angeles	6
	38905 STANRIDGE AVE	PALMDALE	93550	Los Angeles	6
	38940-38953 STANRIDGE AVE	PALMDALE	93550	LOS ANGELES	6
	1020 E AVENUE R	PALMDALE	93550	Los Angeles	80
	1040 BUSCHMANN RD	PARADISE	95969	Butte	48
	1030 Parlier Avenue	Parlier	93648	Fresno	87
	640 S ZEDIKER AVE	PARLIER	93648	Fresno	40
	1370 N DOMINION AVE	PASADENA	91104	Los Angeles	6
	529 10TH ST	PASO ROBLES	93446	San Luis Obispo	44
	2940 SPRING ST	PASO ROBLES	93446	San Luis Obispo	40
	Templeton Place and				
	401 Oak Hill Rd.	Paso Robles	93446	SAN LUIS OBISPO	29
	167 Edith St	Petaluma	94952	Sonoma	22
	109 MAGNOLIA AVE	PETALUMA	94952	Sonoma	90
	149 WYNDHAM WAY	PETALUMA	94954	Sonoma	57
	200 Douglas Street	PETALUMA	94952	Sonoma	23
	300 K Street	PETALUMA	94952	Sonoma	13
	9036 Washington Blvd.	Pico Rivera	90660	Los Angeles	70
	9220 Verner St	PICO RIVERA	90660	Los Angeles	75
	760 Alvarez Avenue	PINOLE	94564	Contra Costa	19
	1780 CHESTER DR	PITTSBURG	94565	Contra Costa	78
	425 E SANTA FE AVE	PITTSBURG	94565	Contra Costa	20
	2131 CRESTVIEW LN	PITTSBURG	94565	Contra Costa	163
	200 Presidio Ln	Pittsburg	94565	Contra Costa	104
	390 E LELAND RD	PITTSBURG	94565	Contra Costa	145
	375 PRESIDIO LN	PITTSBURG	94565	Contra Costa	60
	1050 E Imperial Hwy	Placentia	92870	Orange	58
	6600 MOTHER LODGE DR	PLACERVILLE	95667	El Dorado	55
	6600 Mother Lode Dr	PLACERVILLE	95667	El Dorado	45
	1400 WOODMAN CIR	PLACERVILLE	95667	El Dorado	67
	102 CHILPANCINGO PKY	PLEASANT HILL	94523	Contra Costa	25
	251 KOTTINGER DR	PLEASANTON	94566	Alameda	40
	600 A Street	POINT REYES ST	94956	Marin	25
	775 PALOMARES	POMONA	91766	Los Angeles	165
	1356 Ashport St	POMONA	91768	Los Angeles	31
	1550 S San Antonio Ave	Pomona	91766	Los Angeles	70
	286 Beaver Court	POMONA	91766	Los Angeles	80
	703 N VENTURA RD	PORT HUENEM	93041	Ventura	91
	290 N 4th St	Porterville	93257	Tulare	65
	250 N. THIRD ST	PORTERVILLE	93257	Tulare	105
	6705 W. Avenue M	Quartz Hill	93536	Los Angeles	75
	1374 PEPPARD FLAT RD	QUINCY	95971	Plumas	48
	6230 HAVEN AVE	RANCHO CUCA	91701	San Bernardino	117
	1275 WALNUT ST	RED BLUFF	96080	Tehama	50

APPENDIX C
AB 693 - HUD-ASSISTED QUALIFIED MULTIFAMILY PROPERTIES

<u>Property Name</u>	<u>Address</u>	<u>City</u>	<u>Zip</u>	<u>County</u>	<u>Total Units</u>
	460 Main St	Red Bluff	96080	Tehama	24
	200 JACKSON ST	RED BLUFF	96080	Tehama	30
	805 Orange Street	RED BLUFF	96080	Tehama	12
	460 MAIN ST	RED BLUFF	96080	Tehama	70
	440 REDLANDS BLVD	REDLANDS	92373	San Bernardino	75
	151 JUDSON ST	REDLANDS	92374	San Bernardino	61
	460 E Fern Ave	Redlands	92373	San Bernardino	62
	319 N BROADWAY	REDONDO BEACH	90277	Los Angeles	47
	124 Alameda De Las Pulgas	Redwood City	94062	San Mateo	5
	1280 VETERANS BLVD	REDWOOD CITY	94063	San Mateo	136
	104 Cedar St	Redwood City	94063	San Mateo	15
	350 GUNTER LN	REDWOOD CITY	94065	San Mateo	104
	875 WALNUT ST	REDWOOD CITY	94063	San Mateo	59
	635 SPRUCE ST	REDWOOD CITY	94063	San Mateo	27
	128 S HANEY AVE	REEDLEY	93654	Fresno	38
	302 W MERRILL ST	RIALTO	92376	San Bernardino	100
	SWC Foothill Blvd./Cactus Avenue	Rialto	92376	San Bernardino	74
	200 W. MERRILL AVE	Rialto	92376	San Bernardino	70
	545 Bloomington Avenue	Rialto	92376	San Bernardino	75
	1150 N WILLOW AVE	RIALTO	92376	San Bernardino	100
	5317 Creely Ave	RICHMOND	94804	Contra Costa	36
	740 BARRETT AVE	RICHMOND	94801	Contra Costa	58
	700 BARRETT AVE	RICHMOND	94801	Contra Costa	115
	1555 3RD STREET	RICHMOND	94801	Contra Costa	52
	978 THIRTEENTH ST	RICHMOND	94801	Contra Costa	10
	121 W MACDONALD AVE	RICHMOND	94801	Contra Costa	158
	1336 N El Prado Dr	Ridgecrest	93555	Kern	15
	24643 SCHOOL RD	RIPLEY	92225	Riverside	50
	5870 MISSION BLVD	RIVERSIDE	92506	RIVERSIDE	54
	6105 SUNSET BLVD	ROCKLIN	95677	Placer	67
	3950 EVELYN AVE	ROCKLIN	95677	Placer	43
	5725 SHANNON BAY DR	ROCKLIN	95677	Placer	79
	710 Willow Ave	Rodeo	94572	Contra Costa	50
	735 BONNIE AVE	ROHNERT PARK	94928	Sonoma	6
	712 LAGUNA DRIVE	ROHNERT PARK	94928	Sonoma	24
	18345 Aguiro Street	ROWLAND HEIGHTS	91748	Los Angeles	6
	235 MARTELLA STREET	SALINAS	93901	Monterey	12
	736 WILLIAMS RD	SALINAS	93905	Monterey	100
	510 E MARKET ST	SALINAS	93905	Monterey	75
	306 Soledad St	Salinas	93901	Monterey	20
	276 CALIFORNIA ST	SAN ANDREAS	95249	Calaveras	20
	342 GOLDSTRIKE RD	SAN ANDREAS	95249	Calaveras	8
	27 MARIPOSA AVE	SAN ANSELMO	94960	Marin	14
	377 E Gilbert St	San Bernardino	92404	San Bernardino	90
	24317 East 4th Street	SAN BERNARDINO	92410	San Bernardino	40
	1365 N. WATERMAN AVE.	SAN BERNARDINO	92404	San Bernardino	100
	2631 WEST SECOND STREET	San Bernardino	92410	San Bernardino	239
	2000 JUBILEE CT	SAN BERNARDINO	92411	San Bernardino	125
	191 West 2nd Street	SAN BERNARDINO	92408	San Bernardino	267
	1530 W. Baseline Street	SAN BERNARDINO	92411	SAN BERNARDINO	74
	2122 West Chestnut St	SAN BERNARDINO	92410	San Bernardino	184
	550 W 5TH ST	SAN BERNARDINO	92401	San Bernardino	150
	772-776 4th Street	SAN BERNARDINO	92410	SAN BERNARDINO	75
	SWC 4th and G Street	San Bernardino	92410	San Bernardino	74
	365 Commercial Road	SAN BERNARDINO	92408	San Bernardino	75
	602-666 West 6th Street	SAN BERNARDINO	92410	SAN BERNARDINO	75
	1422 E 9TH ST	SAN BERNARDINO	92410	San Bernardino	160
	105 AVENIDA PRESIDIO	SAN CLEMENTE	92672	Orange	72
	3541 PARK BLVD	SAN DIEGO	92103	San Diego	100
	3360 4th Avenue	SAN DIEGO	92103	San Diego	15
	3911 PARK BLVD	SAN DIEGO	92103	San Diego	206
	1551 THIRD AVE	SAN DIEGO	92101	San Diego	222
	2835 CLAIRMONT DR.	SAN DIEGO	92117	San Diego	46
	904 State St	SAN DIEGO	92101	San Diego	150
	SE corner of Commercial St. & 21st Street	San Diego	92113	San Diego	0
	1183 25TH ST	SAN DIEGO	92154	San Diego	152
	4115 EUCLID AVE	SAN DIEGO	92105	San Diego	12
	3955 PARK BLVD	SAN DIEGO	92103	San Diego	168

APPENDIX C
AB 693 - HUD-ASSISTED QUALIFIED MULTIFAMILY PROPERTIES

<u>Property Name</u>	<u>Address</u>	<u>City</u>	<u>Zip</u>	<u>County</u>	<u>Total Units</u>
	4041 IBIS ST	SAN DIEGO	92103	San Diego	149
	4142 42ND ST	SAN DIEGO	92105	San Diego	126
	333 G ST	SAN DIEGO	92101	San Diego	153
	620 67TH ST	SAN DIEGO	92114	San Diego	38
	6888 GOLFCREST DR	SAN DIEGO	92119	San Diego	126
	5700 IMPERIAL AVE	SAN DIEGO	92114	San Diego	60
	310 MARKET ST	SAN DIEGO	92101	San Diego	131
	1455 SECOND AVE	SAN DIEGO	92101	San Diego	200
	4392 W Point Loma Blvd	SAN DIEGO	92107	San Diego	500
	7844 PARADISE VALLEY RD	SAN DIEGO	92139	San Diego	448
	4077 5th Ave	San Diego	92103	SAN DIEGO	23
	1172 30th St	SAN DIEGO	92154	San Diego	72
	4809-4815 70th St	SAN DIEGO	92115	SAN DIEGO	19
	1055 9TH AVE	SAN DIEGO	92101	San Diego	156
	727 E St	San Diego	92101	San Diego	125
	2635 SECOND AVE	SAN DIEGO	92103	San Diego	152
	3940 PARK BLVD	SAN DIEGO	92103	San Diego	100
	4227 52 St.	SAN DIEGO	92115	San Diego	70
	1148 BEYER WAY	SAN DIEGO	92154	San Diego	102
	3155 L Street	SAN DIEGO	92102	San Diego	21
	5343 MONROE AVE	SAN DIEGO	92115	San Diego	161
	1730 THIRD AVE	SAN DIEGO	92101	San Diego	156
	249 S Acacia St	SAN DIMAS	91773	Los Angeles	50
	505 N San Dimas Canyon Rd	San Dimas	91773	Los Angeles	65
	1045 CAPP ST	SAN FRANCISCO	94110	San Francisco	30
	670 VALENCIA STREET	SAN FRANCISCO	94103	San Francisco	49
	390 CLEMENTINA ST	SAN FRANCISCO	94103	San Francisco	206
	65 Navy Rd	San Francisco	94124	San Francisco	157
	656 GROVE ST	SAN FRANCISCO	94102	San Francisco	120
	654 GROVE STREET	SAN FRANCISCO	94102	San Francisco	15
	777 BROADWAY STREET	SAN FRANCISCO	94133	San Francisco	31
	5545 THIRD STREET	SAN FRANCISCO	94124	San Francisco	54
	1227 HAMPSHIRE ST	SAN FRANCISCO	94110	San Francisco	50
	580 CAPP ST	SAN FRANCISCO	94110	San Francisco	133
	1150 WEBSTER ST	SAN FRANCISCO	94115	San Francisco	68
	1250 Haight Street	San Francisco	94117	San Francisco	39
	90 Bartlett ST	SAN FRANCISCO	94110	San Francisco	51
	5157 DIAMOND HEIGHTS BLVD	SAN FRANCISCO	94131	San Francisco	21
	3290 25th street	SAN FRANCISCO	94110	San Francisco	11
	5199 Mission Street	SAN FRANCISCO	94112	San Francisco	36
	296 ADDISON ST	SAN FRANCISCO	94131	San Francisco	58
	54 MCALLISTER ST	SAN FRANCISCO	94102	San Francisco	100
	711 EDDY ST	SAN FRANCISCO	94109	San Francisco	202
	1096 EDDY ST	SAN FRANCISCO	94109	San Francisco	22
	66 9th Street	San Francisco	94103	San Francisco	107
	1355 GOLDEN GATE AVENUE	SAN FRANCISCO	94115	San Francisco	255
	1099 FILLMORE ST	SAN FRANCISCO	94115	San Francisco	101
	3590 19TH STREET	SAN FRANCISCO	94110	San Francisco	39
	328 Tehama St	San Francisco	94103	San Francisco	85
	799 OAK ST	SAN FRANCISCO	94117	San Francisco	20
	1201 GOLDEN GATE AVE	SAN FRANCISCO	94115	San Francisco	106
	145 GUERRERO ST	SAN FRANCISCO	94103	San Francisco	110
	1049 GOLDEN GATE AVE	SAN FRANCISCO	94115	San Francisco	104
	820 MCALLISTER ST	SAN FRANCISCO	94102	San Francisco	192
	621 Gough St	San Francisco	94102	San Francisco	190
	40 Friendship Way	SAN FRANCISCO	94117	San Francisco	68
	40 Friendship Way	SAN FRANCISCO	94117	San Francisco	90
	137 ADDISON ST	SAN FRANCISCO	94131	San Francisco	275
	848 Kearny St	San Francisco	94108	San Francisco	105
	500 RAYMOND STREET	SAN FRANCISCO	94134	San Francisco	91
	1640 STEINER ST	SAN FRANCISCO	94115	San Francisco	32
	1950 POST ST	SAN FRANCISCO	94115	San Francisco	103
	1727 FILLMORE ST	SAN FRANCISCO	94115	San Francisco	51
	926 FILLMORE ST	SAN FRANCISCO	94117	San Francisco	25
	1483 MASON ST	SAN FRANCISCO	94133	San Francisco	70
	980 HOWARD ST	SAN FRANCISCO	94103	San Francisco	24
	950 BUCHANAN, BLDG #2 ST	SAN FRANCISCO	94102	San Francisco	105
	1680 EDDY ST	SAN FRANCISCO	94115	San Francisco	211

APPENDIX C
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<u>Property Name</u>	<u>Address</u>	<u>City</u>	<u>Zip</u>	<u>County</u>	<u>Total Units</u>
	945 SACRAMENTO ST	SAN FRANCISCO	94108	San Francisco	185
	3365 SACRAMENTO ST	SAN FRANCISCO	94118	San Francisco	151
	200 Sixth Street	San Francisco	94103	San Francisco	0
	1500 Page Street	San Francisco	94117	San Francisco	0
	333 BAKER ST	SAN FRANCISCO	94117	San Francisco	158
	2027 MISSION ST	SAN FRANCISCO	94110	San Francisco	132
	118 DIAMOND ST	SAN FRANCISCO	94114	San Francisco	20
	1776 SUTTER ST	SAN FRANCISCO	94115	San Francisco	33
	1 Ardath CT	SAN FRANCISCO	94124	San Francisco	300
	347 DOLORES ST	SAN FRANCISCO	94110	San Francisco	66
	261 Octavia St	San Francisco	94102	San Francisco	15
	1441 Powell Street	SAN FRANCISCO	94109	San Francisco	54
	241 JONES ST	SAN FRANCISCO	94102	San Francisco	41
	992 Page St	San Francisco	94117	San Francisco	15
	1353 Seventh AVE	SAN FRANCISCO	94122	San Francisco	30
	301 ELLIS STREET	SAN FRANCISCO	94102	San Francisco	92
	2770 LOMBARD ST	SAN FRANCISCO	94123	San Francisco	55
	1170 McAllister St	San Francisco	94115	San Francisco	92
	1272 SOUTH VAN NESS AVE	SAN FRANCISCO	94102	San Francisco	12
	4699 Third St	San Francisco	94124	San Francisco	49
	1251 Turk Street	San Francisco	94115	San Francisco	0
	1240 FILLMORE ST	SAN FRANCISCO	94115	San Francisco	142
	50 RIZAL ST	SAN FRANCISCO	94107	San Francisco	147
	420-430 29th Avenue	San Francisco	94118	San Francisco	20
	1480 SUTTER ST	SAN FRANCISCO	94109	San Francisco	68
	1086 Golden Gate Ave. #G	SAN FRANCISCO	94115	San Francisco	98
	220 CASHMERE ST	SAN FRANCISCO	94124	San Francisco	94
	121 Golden Gate Avenue	San Francisco	94102	San Francisco	0
	1825 Mission St	San Francisco	94103	San Francisco	124
	1280 LAGUNA ST	SAN FRANCISCO	94115	San Francisco	183
	150 FRANCISCO ST	SAN FRANCISCO	94133	San Francisco	116
	155 FRANCISCO STREET	SAN FRANCISCO	94133	San Francisco	114
	940 POWELL ST	SAN FRANCISCO	94108	San Francisco	98
	816 EAST GRAND AVE #D	SAN GABRIEL	91776	Los Angeles	14
	947C Branham Lane	SAN JOSE	95136	Santa Clara	52
	1582 KOOSER RD	SAN JOSE	95118	Santa Clara	123
	282 DANZE DR	SAN JOSE	95111	Santa Clara	100
	2360 SAMARITAN Place	SAN JOSE	95124	Santa Clara	153
	175 N CAPITOL AVE	SAN JOSE	95127	Santa Clara	85
	200 S MARKET ST	SAN JOSE	95113	Santa Clara	165
	814 SAINT ELIZABETH DR	SAN JOSE	95126	Santa Clara	70
	5350 Monterey Hwy	San Jose	95111	Santa Clara	14
	460 FRANCIS DR	SAN JOSE	95133	Santa Clara	18
	690 NORTH FIFTH ST	SAN JOSE	95112	Santa Clara	140
	1710 ALUM ROCK AVE	SAN JOSE	95116	Santa Clara	60
	1033 Lick Ave	San Jose	95110	Santa Clara	24
	5030 Union AVE	SAN JOSE	95124	Santa Clara	15
	132 N. JACKSON AVE	SAN JOSE	95116	Santa Clara	43
	85 S FIFTH ST	SAN JOSE	95112	Santa Clara	87
	632-4 N JACKSON AVE	SAN JOSE	95133	Santa Clara	168
	77 Kentucky Place	SAN JOSE	95116	Santa Clara	50
	2627 MADDEN AVE	SAN JOSE	95116	Santa Clara	210
	2850 ROSE AVE	SAN JOSE	95127	Santa Clara	15
	Corner of Ford and Monterey Roads	San Jose	95100		18
	4375 PAYNE AVE	SAN JOSE	95117	Santa Clara	160
	1500 CUNNINGHAM AVE	SAN JOSE	95122	Santa Clara	216
	4668 Albany Dr	SAN JOSE	95129	Santa Clara	176
	60 N THIRD Street	SAN JOSE	95112	Santa Clara	216
	2400 ENBORG LN	SAN JOSE	95128	Santa Clara	29
	5347 DENT AVE	SAN JOSE	95118	Santa Clara	29
	1601 165TH AVE	SAN LEANDRO	94578	Alameda	116
	2121 E 14th Street	San Leandro	94544	Alameda	50
	342 WEST JOAQUIN AVE	SAN LEANDRO	94577	Alameda	7
	2390 East 14th Street	SAN LEANDRO	94577	Alameda	16
	232 East 14th Street	SAN LEANDRO	94577	Alameda	60
	649 BRANCH ST	SAN LUIS OBISP	93401	San Luis Obispo	9
	3000 AUGUSTA ST	SAN LUIS OBISP	93401	San Luis Obispo	107
	3042 Augusta Street	SAN LUIS OBISP	93401	San Luis Obispo	32

APPENDIX C
AB 693 - HUD-ASSISTED QUALIFIED MULTIFAMILY PROPERTIES

<u>Property Name</u>	<u>Address</u>	<u>City</u>	<u>Zip</u>	<u>County</u>	<u>Total Units</u>
	955 MONTEREY ST	SAN LUIS OBISP	93401	San Luis Obispo	68
	2248 TIERRA VERDE	SAN MARCOS	92069	SAN DIEGO	6
	411 CARLO ST	SAN MARCOS	92069	San Diego	12
	2604 FLORES ST	SAN MATEO	94403	San Mateo	72
	700 LAUREL AVE	SAN MATEO	94401	San Mateo	198
	14041 SAN PABLO AVE	SAN PABLO	94806	Contra Costa	81
	1300 RUMRILL BLVD	SAN PABLO	94806	Contra Costa	61
	164 N SAN PEDRO RD	SAN RAFAEL	94903	Marin	72
	375 CATALINA BLVD	SAN RAFAEL	94901	Marin	11
	1351 LINCOLN AVE	SAN RAFAEL	94901	Marin	13
	455 Manuel T. Freitas Parkway	SAN RAFAEL	94903	Marin	62
	626 DEL GANADO RD	SAN RAFAEL	94903	Marin	12
	393 NOVA ALBION WAY	SAN RAFAEL	94903	Marin	6
	96 PILGRIM WAY	SAN RAFAEL	94903	Marin	61
	3878 BEYER BLVD	SAN YSIDRO	92173	San Diego	60
	440 S VISTA AVE	SAN YSIDRO	92173	San Diego	40
	1401 N FLOWER ST	SANTA ANA	92706	Orange	200
	1128 W HIGHLAND ST	SANTA ANA	92703	Orange	12
	100 N. Ross Street	SANTA ANA	92701	Orange	199
	2508 W 1ST ST	SANTA ANA	92703	Orange	54
	649 PILGRIM TERRACE DR	SANTA BARBARA	93101	Santa Barbara	84
	420 E DE LA GUERRA	SANTA BARBARA	93101	Santa Barbara	50
	418 SANTA FE PL	SANTA BARBARA	93109	Santa Barbara	107
	4202 Calle Real	Santa Barbara	93110	Santa Barbara	95
	23420 AVENIDA ROTELLA	SANTA CLARITA	91355	Los Angeles	64
	84 BLACKBURN ST	SANTA CRUZ	95060	Santa Cruz	35
	1840 MACIEL AVE	SANTA CRUZ	95062	Santa Cruz	21
	1635 TREMONT DR	SANTA CRUZ	95062	Santa Cruz	76
	1460 JOSE AVE	SANTA CRUZ	95062	Santa Cruz	126
	721 BAY ST	SANTA CRUZ	95060	Santa Cruz	94
	211 Gault Street	SANTA CRUZ	94060	Santa Cruz	37
	1041 Cayuga St	Santa Cruz	95062	Santa Cruz	14
	2206 - 40th Avenue	Santa Cruz	95062	Santa Cruz	18
	134 DAKOTA AVE.	SANTA CRUZ	95060	Santa Cruz	78
	148-S BLAINE ST	SANTA CRUZ	95060	Santa Cruz	71
	1380 30TH AVE	SANTA CRUZ	95062	Santa Cruz	84
	740 Plymouth ST	SANTA CRUZ	95060	Santa Cruz	18
	13335 LAKELAND AVE.	SANTA FE SPRIN	90670	Los Angeles	24
	11011 CULTURA STREET, #B-101	SANTA FE SPRIN	90670	Los Angeles	141
	9309 Pioneer Boulevard	Santa Fe Spring	90670	Los Angeles	135
	12015 LAKELAND RD	SANTA FE SPRIN	90670	Los Angeles	22
	9800 Jersey Ave	SANTA FE SPRIN	90670	Los Angeles	34
	1106 N SCHOOL ST	SANTA MARIA	93454	Santa Barbara	6
	4845 S BRADLEY RD	SANTA MARIA	93455	Santa Barbara	40
	120 N BROADWAY	SANTA MARIA	93454	Santa Barbara	122
	280 E NEWLOVE DR	SANTA MARIA	93454	Santa Barbara	35
	1760 S MC CLELLAND	SANTA MARIA	93454	SANTA BARBARA	18
	250 E. Newlove Drive	SANTA MARIA	93454	Santa Barbara	9
	3356 Barnard Way	Santa Monica	90405	Los Angeles	61
	1116-1146 4th ST	SANTA MONICA	90403	LOS ANGELES	66
	1441 21st St	Santa Monica	90404	Los Angeles	100
	2851 LINCOLN BOULEVARD	SANTA MONICA	90405	LOS ANGELES	40
	3100 NEILSON WAY	SANTA MONICA	90405	Los Angeles	100
	1637 Appian Way	SANTA MONICA	90401	Los Angeles	25
	2019-25 FIFTH ST				
	2219-21 FIFTH ST	SANTA MONICA	90405	Los Angeles	24
	1525 Euclid St	Santa Monica	90404	Los Angeles	13
	1011 - 11th Street	SANTA MONICA	90403	Los Angeles	69
	1112 7TH ST	SANTA MONICA	90403	Los Angeles	285
	1125 3rd St	Santa Monica	90403	Los Angeles	72
	801 TUPPER ST	SANTA ROSA	95404	Sonoma	159
	1822 MANOR DR	SANTA ROSA	95403	Sonoma	4
	1080 Jennings Avenue	Santa Rosa	95401	Sonoma	54
	4601 MONTGOMERY DR	SANTA ROSA	94509	Sonoma	111
	1050 THIRD ST	SANTA ROSA	95404	Sonoma	186
	2600 Northcoast Street	SANTA ROSA	95403	Sonoma	100
	2600 Northcoast ST	SANTA ROSA	95403	Sonoma	131
	1945 LONG DR	SANTA ROSA	95405	Sonoma	49

APPENDIX C
AB 693 - HUD-ASSISTED QUALIFIED MULTIFAMILY PROPERTIES

<u>Property Name</u>	<u>Address</u>	<u>City</u>	<u>Zip</u>	<u>County</u>	<u>Total Units</u>
	450 STONY POINT RD	SANTA ROSA	95401	Sonoma	104
	101 BOAS DR	SANTA ROSA	95409	Sonoma	50
	10450 N MAGNOLIA AVE	SANTEE	92071	San Diego	188
	14520 FRUITVALE AVE	SARATOGA	95070	Santa Clara	150
	18855 COX AVE	SARATOGA	95070	Santa Clara	20
	408 BEE ST	SAUSALITO	94965	Marin	6
	1466 YOSEMITE ST	SEASIDE	93955	Monterey	192
	1773 WARING PLACE	SEASIDE	93955	Monterey	133
	1680 BROADWAY AVE	SEASIDE	93955	Monterey	80
	7777 Bodega Ave	Sebastopol	95472	Sonoma	138
	7777 Bodega AVE	SEBASTOPOL	95472	Sonoma	60
	2375 FLORAL AVE	SELMA	93662	Fresno	56
	2067 ALAMITOS AVE	SIGNAL HILL	90806	LOS ANGELES	24
	1384 Katherine Road	Simi Valley	93063	Ventura	0
	1010 Ashland Ave	SIMI VALLEY	93065	VENTURA	14
	1770 Heywood St	Simi Valley	93065	Ventura	74
	10888 KELSO CT	SONORA	95370	Tuolumne	7
	3170 SOUTHERN AVE	SOUTH GATE	90280	Los Angeles	75
	3421 SPRUCE AVE APT 3	SOUTH LAKE TA	96150	El Dorado	92
	1801 LAKE TAHOE BLVD	SOUTH LAKE TA	96150	El Dorado	76
	750 Emerald Bay Road	SOUTH LAKE TA	96150	El Dorado	17
	65 CHESTNUT AVENUE	SOUTH SAN FR	94080	San Mateo	40
	77 Westborough Blvd	South San Fran	94080	San Mateo	74
	433 Alida Way	South San Fran	94080	San Mateo	181
	10572 Knott Ave	Stanton	90680	Orange	10
	3700 N SUTTER ST	STOCKTON	95204	San Joaquin	163
	507 N PILGRIM ST	STOCKTON	95205	San Joaquin	10
	6 W Main St	Stockton	95202	San Joaquin	128
	144 MUN KWOK LN	STOCKTON	95202	San Joaquin	110
	210 E IRIS AVE	STOCKTON	95210	San Joaquin	130
	6433 INGLEWOOD AVE	STOCKTON	95207	San Joaquin	84
	1320 N MONROE ST	STOCKTON	95203	San Joaquin	65
	25 S COMMERCE ST	STOCKTON	95202	San Joaquin	151
	123 N STANISLAUS ST	STOCKTON	95202	San Joaquin	83
	2501 E. Lafayette St.	STOCKTON	95205	San Joaquin	190
	1059 REED AVE	SUNNYVALE	94086	Santa Clara	95
	450 OLD SAN FRANCISCO RD	SUNNYVALE	94086	Santa Clara	209
	825 Morse Ave	Sunnyvale	94085	Santa Clara	35
	233 CARROLL ST	SUNNYVALE	94086	Santa Clara	101
	267 W California Ave	Sunnyvale	94086	Santa Clara	23
	29210 STONEWOOD RD	TEMECULA	92591	Riverside	55
	2170 N WESTLAKE BLVD	THOUSAND OA	91361	Ventura	11
	130 BRAZIL ST	THOUSAND OA	91360	Ventura	90
	3500 MOUNTCLEF BLVD	THOUSAND OA	91360	Ventura	18
	2220 N WESTLAKE BLVD	THOUSAND OA	91361	Ventura	11
	1077 Warwick Avenue	THOUSAND OA	91360	Ventura	7
	101 ESPERANZA AVE	TIBURON	94920	Marin	12
	100 NED'S WAY	TIBURON	94920	Marin	102
	22520 OCEAN AVE	TORRANCE	90505	Los Angeles	13
	4226 W. 231st Street	TORRANCE	90505	Los Angeles	6
	940 W CARSON, #102	TORRANCE	90277	LOS ANGELES	4
	2000 W 162ND ST	TORRANCE	90504	Los Angeles	101
	22410 Evalyn Avenue	TORRANCE	90505	Los Angeles	6
	435 E 6th St	Tracy	95376	San Joaquin	72
	350 N L St	Tulare	93274	Tulare	60
	1101 S IRWIN ST	TULARE	93274	Tulare	97
	466 F St	TULELAKE	96134	Siskiyou	19
	275 E 6th St	Tustin	92780	Orange	101
	73747 Raymond Way	TWENTYNINE P	92277	San Bernardino	35
	5862 W BAGLEY AVE	TWENTYNINE P	92277	San Bernardino	48
	33935 Alvarado Niles Road	UNION CITY	94587	Alameda	45
	33821 Alvarado Niles Rd	Union City	94587	Alameda	40
	1301 SAN BERNARDINO RD	UPLAND	91786	San Bernardino	100
	2470 NUT TREE RD	VACAVILLE	95687	Solano	56
	25857 SINGING HILLS DR	VALENCIA	91355	Los Angeles	76
	301 BUTTE ST	VALLEJO	94590	Solano	75
	400 REDWOOD STREET	VALLEJO	94590	Solano	120
	750 PETIT AVE	VENTURA	93004	Ventura	75

APPENDIX C
AB 693 - HUD-ASSISTED QUALIFIED MULTIFAMILY PROPERTIES

<u>Property Name</u>	<u>Address</u>	<u>City</u>	<u>Zip</u>	<u>County</u>	<u>Total Units</u>
	14900 Arlette Dr	VICTORVILLE	92394	San Bernardino	101
	115 W MURRAY AVE	VISALIA	93291	Tulare	100
	115 W School Ave	Visalia	93291	Tulare	60
	1089 JENNIFER CIR				
	232 OCEAN VIEW DR	VISTA	92083	San Diego	6
	2507 Hibiscus Avenue	VISTA	92083	SAN DIEGO	6
	1475 OAK DR	VISTA	92084	San Diego	76
	1736 Anza Avenue	VISTA	92084	SAN DIEGO	6
	1658 Montgomery Drive	VISTA	92038	San Diego	6
	3081 Oriente Drive	VISTA	92084	San Diego	6
	800 Arcadia Ave	Vista	92084	San Diego	6
	1768 Monte Mar Road	VISTA	92084	San Diego	6
	1485 MONTEGO STREET	WALNUT CREEK	94598	Contra Costa	80
	1485 Montego	Walnut Creek	94598	Contra Costa	33
	2517-2549 PARKSIDE DR.	WASCO	93280	Kern	24
	107 CALIFORNIA ST	WATSONVILLE	95076	Santa Cruz	5
	240 CLIFFORD AVE	WATSONVILLE	95076	Santa Cruz	100
	1355 MADISON ST	WATSONVILLE	95076	Santa Cruz	100
	380 SISKIYOU WAY	WEED	96094	Siskiyou	48
	929 W CAMERON AVE	WEST COVINA	91790	Los Angeles	158
	3449 E. Calle Baja Avenue	WEST COVINA	91792	Los Angeles	6
	2775 E VALLEY BLVD	WEST COVINA	91792	Los Angeles	84
	721 N AZUSA AVE	WEST COVINA	91791	Los Angeles	82
	800 KINGS RD	WEST HOLLYWOOD	90069	Los Angeles	106
	1123 N Fuller Ave	WEST HOLLYWOOD	90046	Los Angeles	39
	500 6TH STREET	WEST SACRAMENTO	95605	Yolo	66
	2140 EVERGREEN AVE	WEST SACRAMENTO	95691	Yolo	54
	1525 MERKLEY AVE	WEST SACRAMENTO	95691	Yolo	87
	12404 Clearglenn Avenue	WHITTIER	90605	Los Angeles	5
	11481 Walnut St	WHITTIER	90606	Los Angeles	11
	13679 Telegraph Rd	Whittier	90604	LOS ANGELES	75
	7215 BRIGHT AVE	WHITTIER	90602	Los Angeles	156
	8218 SANTA FE SPRINGS RD	WHITTIER	90606	Los Angeles	13
	7025 FRIENDS AVE	WHITTIER	90602	Los Angeles	75
	77 Holly ST	WILLITS	95490	Mendocino	26
	251 SOUTH				
	LENORE STREET	WILLITS	95490	Mendocino	12
	714 N HUMBOLDT AVE	WILLOWS	95988	Glenn	54
	8400 HEMBREE LANE	WINDSOR	95492	Sonoma	60
	762 W LINCOLN AVE	WOODLAND	95695	Yolo	44
	646 3rd St	Woodland	95695	Yolo	48
	582 Kentucky Avenue	WOODLAND	95695	Yolo	15
	555 COMMUNITY LN	WOODLAND	95695	Yolo	93
	1060-E DEER CREEK WAY	YREKA	96097	Siskiyou	36
	402 TURRE ST	YREKA	96097	Siskiyou	46
	885 SIERRA VISTA WAY	YREKA	96097	Siskiyou	31
	1200 GRAY AVE	YUBA CITY	95991	Sutter	74

APPENDIX D – ESTIMATE OF MULTIFAMILY SOLAR COST

<u>Cost Category</u>	<u>Description of Activities</u>	<u>Cost Baseline (1)</u>	<u>2017 Estimate</u>
Equipment	Solar modules, inverters, racking, balance of materials (meters, wiring, conduit, load centers, combiner boxes, and carport installations/retrofits if needed)	\$1.35	\$1.26
Labor	Direct and indirect labor costs for installation of solar energy system	\$0.33	\$0.33
Permitting, Site Engineering and Interconnection	Permitting, inspection and interconnection fees, site design and engineering, construction, management, trenching and street repair, virtual net meeting box fabrication	\$0.12	\$0.12
Project Development	Customer acquisition, project analysis and assessments, project financial underwriting, and contraction negotiation	\$0.37	\$0.37
Overhead	General and administrative (G&A) expenses—including fixed overhead expenses covering payroll, facilities, administrative, finance, legal, information technology, and other corporate functions adjusted based on state “cost of doing business” index	\$0.34	\$0.34
Profit	Developer profit on installation (20%)	\$0.43	\$0.42
TOTAL		\$3.02	\$2.92
Cost Adders	Estimated maximum additional costs for parking canopies, carport installations, high-rise installations, and specialized site issues.	\$0.40	\$0.40
MAXIMUM		\$3.42	\$3.32
<u>AVERAGE</u>		<u>\$3.20</u>	<u>\$3.15</u>

(1) Baseline multifamily installation costs estimates are based on NREL evaluation of solar costs.¹ Cost estimated assume:

- NREL equipment cost for scaled PV installations
- NREL labor cost for scaled PV installations adjusted for higher California wage rates
- NREL permitting, inspection, engineering and interconnection costs
- NREL project development and overhead costs for California residential installations.
- 20% developer profit margin

¹ Donald Chung, Carolyn Davidson, Ran Fu, Kristen Ardani, and Robert Margolis, U.S. Photovoltaic Prices and Cost Breakdowns: Q1 2015 Benchmarks for Residential, Commercial, and Utility-Scale Systems, September, 2015. National Renewable Energy Laboratory.

APPENDIX E – INCENTIVE STRUCTURE for PV INSTALLATIO

Modeling Scenario for Incentives

To estimate the incentive levels required for the Multifamily Solar Roofs Program, we modeled a fully scaled solar PV systems at a 72 unit affordable multifamily complex located in PG&E's territory offsetting both common area and tenant area usage. The assumptions used in the analysis are shown in the table below.

	Total	Residential Unit Systems	Common Areas Systems
Baseline Energy Consumption (kWh)	488,362	346,579	141,782
	<i>1-Bedrooms</i>	<i>94,522</i>	
	<i>2-Bedrooms</i>	<i>110,275</i>	
	<i>3-Bedrooms</i>	<i>141,783</i>	
Tariff Schedule		CARE	A10
PV System Size (kW)	265.10	167.31	97.78
PV System Cost Index (\$/watt)	\$3.20		
PV system Cost (per Cost Index)	\$ 848,304	\$ 535,405	\$ 312,899
PV Generation (kWh)	384,388	242,605	141,782
Percent PV Offset	78%	70%	100%
Percent PV Allocation	100%	63%	37%
Tenant Economic Benefit	100%		
Utility Price Inflation	2%		
TPO PPA Escalators	2%		

In modeling incentive levels we sought to identify a theoretical breakeven point and from that benchmark calculate an incentive levels meeting the value expectations of both tenants and property owners. The modeling considered both property purchase scenarios and TPO financed installations. The modeling also consider scenarios for existing properties making solar retrofits that cannot access Federal renewable investment tax credits (ITCs), and scenarios where a property owner is installing a solar energy system at part of broader property financing in which Low Income Housing Tax Credits (LIHTC) and ITC can be leveraged and leveraged to reduce the costs of solar energy system.

APPENDIX E – INCENTIVE STRUCTURE for PV INSTALLATIO

#1: BASELINE SCENARIO – EXISITNG MULTIFAMILY PROPERTIES WITHOUT LIHTC FINANCING

	BENCHMARK		Property Purchase 4% LIHTC		TPO Supported	
	Common	Resident	Common	Resident	Common	Resident
PV Costs	\$312,899	\$545,405	\$312,899	\$545,405	\$312,899	\$545,405
PV Allocation	37%	63%	37%	63%	37%	63%
Incentives	\$1.92	\$2.88	\$2.24	\$3.20	\$1.60	\$2.24
Blended Incentive Rate	\$2.53		\$2.85		\$2.00	
Inventive Amount	\$187,740	\$481,864	\$219,029	\$535,405	\$156,450	\$374,783
Sources Leveraged and Gap Analysis						
ITC	\$0.00		\$0.00		(\$92,121)	
LIHTC	\$0.00		\$0.00		0	
Funding Gap	\$178,700		\$93,870		\$221,950	
Finance Costs	\$128,563		\$67,553		\$100,843	
Total Gap (Funding Gap + Financing)	\$307,263		\$161,403		\$322,793	
Funding Gap Coverage						
Property Cash Flow	\$22,562		\$22,562		\$22,562	
Debt Supported by Cash Flow	\$262,438		\$262,438		\$451,245	
Property Contribution (Debt Service or PPA Payment)	\$332,510		\$161,403		\$460,969	
Tenant Benefit						
Tenant Benefits (Average Annual)	\$45,178		\$45,178		\$45,178	
Tenant Benefits (20-year estimate)	\$703,347		\$703,347		\$703,347	
Tenant Benefit (Avg. per Unit per yr)	\$488.44		\$488.44		\$488.44	
Operations and Maintenance						
O&M (Average Annual)	\$10,127		\$10,127		Included in PPA	
O&M (20-year estimate)	\$177,131		\$177,131		Included in PPA	
Third Party Agreements						
Estimated TPO PPA Rate	\$0.03/kWh		\$0.019/kWh		\$0.049	

APPENDIX E – INCENTIVE STRUCTURE for PV INSTALLATIO

#2: LEVERAGE SCENARIO – EXISITING PROPRITIES WITH LIHTC FINANCING

	BENCHMARK		Property Purchase 4% LIHTC		TPO Supported	
	Common	Resident	Common	Resident	Common	Resident
PV Costs	\$312,899	\$545,405	\$312,899	\$545,405	\$312,899	\$545,405
PV Allocation	37%	63%	37%	63%	37%	63%
Incentives	\$0.96	\$1.60	\$1.28	\$1.92	\$1.60	\$2.24
Blended Incentive Rate	\$1.36		\$1.71		\$2.00	
Inventive Amount	\$93,870	\$267,702	\$125,160	\$321,243	\$156,450	\$374,783
Sources Leveraged and Gap Analysis						
ITC	(\$116,816)		(\$96,456)		(\$92,121)	
LIHTC	(\$248,094)		(\$201,733)		0	
Funding Gap	\$171,441		\$103,712		\$221,950	
Finance Costs	\$109,277		\$66,107		\$100,843	
Total Gap (Funding Gap + Financing)	\$280,718		\$169,819		\$322,793	
Funding Gap Coverage						
Property Cash Flow	\$22,562		\$22,562		\$22,562	
Debt Supported by Cash Flow	\$275,586		\$275,586		\$451,245	
Property Contribution (Debt Service or PPA Payment)	\$280,718		\$169,819		\$460,969	
Tenant Benefit						
Tenant Benefits (Average Annual)	\$45,178		\$45,178		\$45,178	
Tenant Benefits (20-year estimate)	\$703,347		\$703,347		\$703,347	
Tenant Benefits (Avg. per Unit per yr)	\$488.44		\$488.44		\$488.44	
Operations and Maintenance						
O&M (Average Annual)	\$10,127		\$10,127		Included in PPA	
O&M (20-year estimate)	\$177,131		\$177,131		Included in PPA	
Third Party Agreements						
Estimated TPO PPA Rate	\$0.072/kWh		\$0.06/kWh		\$0.049	

APPENDIX E – INCENTIVE STRUCTURE for PV INSTALLATIO

#3: LEVERAGE SCENARIO – NEW CONSTRUCTION WITH LIHTC FINANCING

	Property Purchase 9% LIHTC	
	Common	Resident
PV Costs	\$312,899	\$535,405
PV Allocation	37%	63%
Incentives	\$0.26	\$0.26
Blended Incentive Rate	\$0.26	
Inventive Amount	\$25,031	\$42,843
Sources Leveraged and Gap Analysis		
ITC	(\$234,132)	
LIHTC	(\$605,665)	
Funding Gap	0	
Finance Costs	0	
Total Gap (Funding Gap + Financing)	0	
Funding Gap Coverage		
Property Cash Flow	\$22,562	
Debt Supported by Cash Flow	\$376,037	
Property Contribution	O&M Costs	
Tenant Benefit		
Tenant Benefits (Average Annual)	\$45,178	
Tenant Benefits (20-year estimate)	\$703,347	
% Benefits Retained	\$488.44	
Operations and Maintenance		
O&M (Average Annual)	\$10,127	
O&M (20-year estimate)	\$177,131	

APPENDIX E – INCENTIVE STRUCTURE for PV INSTALLATIO

ASSESSMENT OF SCENARIOS

<p>#1: BASELINE INCENTIVE SCENARIOS – Solar PV Retrofit without access to other resources to offset solar costs</p>	<ul style="list-style-type: none"> ▪ Benchmark assumes access to financing at 6% financing for 20 years. Benchmark provide slightly less cash flow than is required for debt service, no coverage of to property O&M costs, and no return on investment. However, cash flow would be sufficient cash flow to cover estimated PPA costs of \$0.03 per kWh. ▪ Property purchase option shows incentive levels required to accomplish a PV system purchase and cover ongoing O&M costs from common area savings. Because financing in rolled into a long-term mortgage, debt service costs under this options result in kWh costs under \$02/kWh. Additionally, at this incentive level, TPO agreements should be structured as pre-paid agreement to deliver comparable benefits. ▪ TPO option reflects incentive level required achieve the minimal level of cash flow to cover TPO agreement costs. This level is an optimal level for TPO program transactions. Adjusting the incentives upward slightly to \$2.30/watt will ensued cash flows to meet typical financial underwriting debt rations (1.2).
<p>#2: LEVERAGE SCENARIO – Existing multifamily with LIC financing</p>	<ul style="list-style-type: none"> ▪ Benchmark assumed LIHTC funding fixed mortgage including unfund solar costs. Benchmark provide slightly less cash flow than is required for debt service, no coverage of to property O&M costs, and no return on investment. Additionally, the cash flows would not be sufficient to cover estimated PPA payments of \$079/kWh because of tenant benefit requirements. ▪ Property purchase option shows incentive levels required to accomplish a PV system purchase in conjunction with LIHTC financing. The option generates sufficient cash flow from common area savings to cover debt service. Energy costs under the purchase option are \$\$0.023/kWh compared to \$0.078/kWh under TPO PPA over 20-year period. TPO options cannot be supported at this incentive level. ▪ TPO option reflects incentive level required achieve project cash flow sufficient to cover ongoing TPO PPA costs. TPO would require greater inventive levels that property purchase with LIHTC financing. Therefore option is not cost-effective .TPO costs are higher that purchase options because multifamily properties can leverage the ITC as part of LIHTC-financed projects. Under this approach property also pay rent in excess of what the debt service payment would have been; in the case shown approximately \$220,000. Purchase options provide greater benefits at lower cost.
<p>#3: LEVERAGE SCENARIO – Newly constructed multifamily housing with LIHTC</p>	<ul style="list-style-type: none"> ▪ The purchase option for new construction identifies the amount needed to fully fund the installation of the solar energy system. TPO options are not considered viable for LIHTC new construction or rehabilitation projects.



**CALIFORNIA PUBLIC
UTILITIES COMMISSION**

Ensuring safe and reliable service at just and reasonable rates

DIVISION ANALYSIS CONFIDENTIAL-Government Code §6254(l)		
Subject: Multifamily Affordable Housing Renewables Program		Bill number: AB 693
Division(s): Energy	Fiscal Impact? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Bill version: As Amended June 16, 2015
Division staff author(s): Elizabeth Curran; Amy Kochanowsky		Bill author: Eggman, Williams
Date director(s) approved:	Date fiscal approved:	Bill sponsor:

RECOMMENDATION FOR LEGISLATIVE SUBCOMMITTEE POSITION

- | | |
|--|---|
| <input type="checkbox"/> Support | <input type="checkbox"/> Support if amended |
| <input type="checkbox"/> Oppose | <input type="checkbox"/> Oppose unless amended |
| <input checked="" type="checkbox"/> Neutral | <input type="checkbox"/> None |

SUMMARY OF BILL

This bill would create the Multifamily Affordable Housing Renewables Program, which would provide monetary incentives for the installation of qualified renewable energy systems (not limited only to solar energy systems) on multifamily affordable housing properties. Specifically, this bill:

- Requires the CPUC to authorize \$100,000,000 annually from the IOUs' Cap-and-Trade allowance revenues to create an incentive program for qualifying renewable energy systems. These allowance revenues must be appropriated between the fiscal year commencing July 1, 2016, and ending June 30, 2026, and the incentive payments for multifamily affordable housing properties must continue through December 31, 2030.
- Establishes a target of installing 300 MW of renewable energy systems on multifamily affordable housing properties by 2030.
- Requires that the program be administered by a qualified third party.
- Requires that systems installed under the incentive program "be primarily used to offset electrical usage by low-income tenants".
- Requires that low-income customers participating in the program receive utility bill offsets through virtual net metering tariffs (VNM).
- Requires the CPUC to submit an annual assessment of the program to the Legislature.

CURRENT LAW

- PU Code Section 748.5 specifies that the CPUC shall require all revenues received by an electrical corporation as a result of the direct allocation of greenhouse gas allowances to electric utilities to be credited to residential, small business, and emissions-intensive trade-exposed retail customers, except that the CPUC may allocate up to 15 percent of the revenues to clean energy and energy efficiency projects not otherwise funded.
- PU Code Section 2852, pursuant to AB 2723 (Pavley, 2006), requires the CPUC to ensure that not less than 10 percent of the overall California Solar Initiative (CSI) funds be used to provide monetary incentives for the installation of solar energy systems on low-income residential housing. The CPUC implemented this law in November 2007 (D.07-11-045) and October 2008 (D.08-10-036), which created the Single Family Affordable Solar Homes (SASH) and Multifamily Affordable Solar Housing (MASH) programs respectively.
- PU Code Section 2851, pursuant to AB 217 (Bradford, 2013), authorized \$108 million in additional funding for existing programs that provide monetary incentives for the installation of solar energy systems on low-income residential housing. The bill extends the SASH and MASH programs until 2021, or the exhaustion of new funding, whichever comes first and sets a goal of 50 MW of installed capacity across both programs. The CPUC implemented this law in January, 2015 (D.15-01-027).

AUTHOR'S PURPOSE

The stated purpose of this legislation is to lower energy bills of CARE-eligible tenants in low-income multifamily housing by increasing installations of renewable energy systems at these properties. The CPUC is the appropriate agency to implement this type of incentive program.

EXPLANATION OF BILL'S IMPACT ON CPUC PROGRAMS, PRACTICE & POLICY

1. The bill will reduce the size of the residential California Climate Credit and limit the quantity of the electric investor-owned utilities' (IOUs) greenhouse gas (GHG) allowance proceeds that are available for other clean energy and energy efficiency projects.
2. The Multifamily Affordable Housing Renewables Program would have several important differences from the current Multifamily Affordable Solar Housing (MASH) and Single Family Affordable Solar Homes (SASH) incentive programs.
3. The Multifamily Affordable Housing Renewables program has the potential to overlap with existing incentive programs and to prejudice open proceedings.

1. Impacts on the Electric IOUs' Uses of Allowance Proceeds and the California Climate Credit

Under the Air Resource Board's Greenhouse Gas Cap-and-Trade Regulation, ARB allocates GHG emission allowances to the electric investor-owned utilities. ARB requires the electric

IOUs to consign (i.e. sell) these allowances at ARB's quarterly allowance auctions, and all proceeds must be used for ratepayer benefit subject to CPUC oversight.

Through a series of decisions implementing both the CPUC's responsibilities under the Cap-and-Trade regulation and PU Code § 748.5, the CPUC specified that these allowance proceeds must be distributed to emissions-intensive trade-exposed (EITE) entities, small businesses, and residential customers, with some proceeds used for reasonable administrative and outreach and education costs.

- *AB 693 will reduce the size of the residential California Climate Credit*

Any allowance proceeds that the CPUC approves the utilities to use to fund clean energy and energy efficiency projects, including the new Multifamily Affordable Housing Renewables Program, have the effect of reducing the funds available for the residential California Climate Credit. In Decision (D.) 12-12-033, the CPUC specified that the electric utilities must first allocate allowance proceeds to EITE customers, small business customers, and to address administrative and outreach and education costs. The CPUC also allows the three large electric utilities to allocate allowance proceeds to temporarily offset GHG costs from residential rates.¹ All remaining funds, less any proceeds used for approved clean energy and energy efficiency projects, are distributed to residential customers as the California Climate Credit. Each utility calculates the semi-annual residential California Climate Credit by dividing the total amount of revenues forecast to be available for the Climate Credit by the number of eligible households (and then dividing by two because the credit is distributed twice per year). As residential customers are last to be compensated, the amount of revenue they receive is impacted when clean energy and energy efficiency projects are funded.

Of the forecasted \$1.15 billion available to return to customers in 2015, \$977 million will be returned to residential customers (\$577 million will be returned as the California Climate Credit and \$400 million will be used to offset GHG costs from residential rates). AB 693 would reduce the total distribution to residential customers by \$100 million, or approximately 10% of total funds for residential customers.

- *AB 693 will reduce funding available for other clean energy and energy efficiency projects*

The CPUC has not yet approved any clean energy or energy efficiency projects to be funded with allowance proceeds, though it has clarified in two decisions (D.12-12-033 and D.14-10-033) that the utilities may propose projects that have GHG reductions as a stated and measurable goal and that utilities must demonstrate why the project is best funded using GHG allowance proceeds instead of ordinary recovery through rates.

The CPUC has established a process for the utilities to request the use of up to 15 percent of allowance revenues for clean energy and energy efficiency projects. If a large portion of this

¹The CPUC permitted this use of funds due to previous statutory limitations that prevented the equitable allocation of GHG costs between lower and upper-tier customers and that led to a large disparity between lower-tier and upper-tier electricity rates. However, these statutory limitations have since been removed, and both the proposed decision and the alternative proposed decision in the CPUC's residential rate reform proceeding (R.12-06-013) proposed to eliminate this volumetric rate offset. In future years, funds previously used for this purpose (approximately 35% of total allowance proceeds) will be returned to customers as the California Climate Credit.

available funding is dedicated to the new Multifamily Affordable Housing Renewables Program, less funding will be available for other clean energy and energy efficiency projects.

Based on the utilities 2015 forecast for example, if \$100 million or 9% of total allowance proceeds were used for the new Multifamily Affordable Housing Renewables Program, only \$67 million or 6% would be available for other clean energy and energy efficiency projects.

At present, the CPUC is considering a request by San Diego Gas & Electric Company (SDG&E) to fund its proposed 22-year, \$103 million electric vehicle charging pilot program with allowance proceeds (proceeding A.14-04-014).

- *Requires CPUC to determine process to collect revenues from utilities for Multifamily Affordable Housing Renewables Program*

The bill does not specify how the \$100 million would be apportioned across the investor-owned electric utilities, so the CPUC would need to determine this. Each utility receives allowances from ARB and uses the value of those allowances for the benefit of its own customers. The CPUC would need to determine how the utilities each contribute revenues towards the \$100 million and the methodology to determine how much each utility should contribute towards the total.

- *AB 693 presumes that allowance proceeds will be available after 2020, but ARB's Cap-and-Trade Regulation only specifies allowance allocations through 2020*

AB 693 requires that the CPUC use \$100 million in allowance proceeds annually from July 2016 ending June 30, 2026. However, ARB's Cap-and-Trade Regulation only specifies that electric utilities will receive allowances through 2020. It is unclear whether and how AB 693 expects the CPUC to fund the Multifamily Affordable Housing Renewables Program if allowance revenues are not available after 2020.

2. This new program is significantly different from existing renewable energy programs. The CPUC would need to open a new proceeding to design and establish the program rules. Some differences are described below:

- *Single family homes are excluded from the program proposed by this bill*

There are currently two incentive programs for low-income residential housing under the CSI program. The MASH program provides incentives for the installation of solar energy systems on qualified multifamily affordable housing and the SASH program provides incentives for the installation of solar energy systems on qualified single-family affordable homes.

The incentive program proposed by this bill would only fund renewable energy systems installed on qualifying multifamily affordable housing; systems installed on single-family homes would not be eligible. Because low-income Californians live in both multifamily and single-family residences, if the Legislature's goal is to expand access to the economic benefits of renewable distributed generation to all low-income Californians, it should consider providing funding to installations on single-family homes as well.

- *Solar-electric vs Various Renewable Energy Technologies*

The current MASH program provides incentives only to solar-electric systems. The incentive program proposed by this bill would incentivize “qualifying renewable energy systems”, which it defines as any of 13 different technologies, including many that are unlikely candidates to be installed on multifamily affordable housing properties, such as solar thermal, municipal solid waste conversion, ocean wave, ocean thermal and tidal current.² Because incentive levels are typically technology based and the costs and markets of the 13 technologies identified in the bill are varied, this program may require establishing a variety of incentive levels for a wide range of renewable energy technologies. This would add considerable complexity as compared with the current MASH program.

- *Required participation in virtual net metering tariffs (VNM)*

The bill requires enrollment in virtual net metering tariffs in order to be eligible for participation in the incentive program. The current MASH program provides a higher incentive level for portions of a system that use VNM to assign generation to tenants and guarantee a direct economic benefit of at least 50% of generation allocated to them. However, it also offers a lower incentive level that does not require enrollment in VNM.

This requirement would make certain properties that are eligible to receive the lower incentive level under the current MASH program, ineligible for the proposed incentive program. Under current tariffs, master metered properties (for example many mobile home parks) are not eligible for VNM and therefore would not be eligible to participate in the proposed incentive program. Effectively, this would eliminate certain MASH market actors that focus on mobile homes (e.g., Shorebreak Energy) from participating in this market.

The bill’s requirement that incentive program participants must be enrolled in VNM would ensure that eligible low-income tenants would receive a direct economic benefit from the generation of the installed system in the form of lower utility bills. Under the current MASH program, projects that receive the lower incentive level are not required to demonstrate that tenants receive a direct economic benefit.

- *More stringent eligibility requirements for multifamily low-income properties*

The bill would adopt a more stringent definition of “qualified multifamily affordable-housing property” than is currently required for participation in the MASH program. Any multifamily property that meets the definition of “low-income residential housing” established in PU Code Section 2852 is eligible to participate in the current MASH program.

² The list of the 13 technologies defined by the bill as a “qualifying renewable energy system” is taken directly from PU Code Section 25741. In this context “solar thermal” refers to utility scale solar thermal systems and therefore we assume that solar water heating systems, as defined by PU Code Section 2861(g), would not be eligible for the incentive program proposed by this bill.

In order to be eligible for its proposed incentive program, the bill would require that, in addition to meeting Section 2852's definition, eligible properties would have to meet at least one of the following requirements:

- (A) "The property is located in a disadvantaged community as identified by the California Environmental Protection Agency pursuant to Section 39711 of the Health and Safety Code" (This refers to the CalEnviroScreen Tool)
- (B) "At least 80 percent of the residents reside in households, adjusted by size, having incomes not in excess of 60 percent of the area median income of the county."

Additionally, the bill adds the language "complex of at least five rental housing units" to the definition of multifamily affordable housing property. Although the intent and meaning of this language is unclear, it could be used to limit the participation of some developers who are currently eligible under the MASH program.

- *Bill has unclear requirements with regard to CARE and definition of low-income*

Enrollment in the CARE program is not a requirement to participate in the current MASH program. PU Code Section 2852 uses the California Health and Safety Code's definition of "lower income households".

This bill has the stated goal of "installing qualifying renewable energy systems that have a generating capacity equivalent to at least 300 megawatts for the express purpose of lowering the energy bills of CARE-eligible tenants at low-income multifamily housing." (Section 1(f)). The bill also states that "The commission shall require that the electricity generated by qualifying renewable energy systems installed pursuant to the program be primarily used to offset electricity usage by low-income tenants." (Section 3(d)(3)). However, the bill does not provide a clear definition of "low-income" and does not clearly state that generation must be primarily used to offset usage by CARE customers specifically.

- *Requires 3rd party administrator*

The MASH program is currently administered by PG&E, SCE and CSE (in SDG&E territory). This bill would require that the CPUC select a 3rd party to administer the proposed incentive program. While in the past ED Staff has proposed centralizing MASH program administration into a single administrator across all three electric utilities in order to gain efficiency due to economies of scale and the benefits of standardization, including this requirement in the bill would reduce the CPUC's flexibility when implementing the program. For example, in the event that the CPUC were unable to secure a qualified 3rd party program administrator, it would be unable to delegate this role to the utilities, if this language remains in the bill.

- *Significantly greater funding than current incentive programs*

The bill would fund the proposed incentive program at \$100,000,000 per year over 10 years for a total of \$1 billion. In comparison, the MASH and SASH programs were originally funded at \$108 million each and were recently reauthorized with an additional

\$54 million for each program. The Low-Income component of the CSI-Thermal program has a total budget of \$25 million. The Self Generation Incentive Program (SGIP) is funded at \$83 million per year through 2020.

3. Potential overlap with existing incentive programs and open proceedings:

Although the bill does not specify a start date for the incentive program, it would direct the Commission to allocate funding beginning on July 1, 2016 and, therefore, has the potential to overlap with existing incentive programs for renewable energy installations on multifamily affordable housing:

- The MASH program is authorized through 2021, or the exhaustion of funding, whichever comes first.
- The Self Generation Incentive Program (SGIP) provides incentives for the installation of renewable and emerging technologies and non-renewable fueled conventional combined heat and power projects. Wind, biogas and fuel cells are all technologies that are currently eligible for SGIP incentives and are also included in AB 693's definition of "qualifying renewable energy technologies". However, SGIP does not include a low-income component.

Additionally, this bill may prejudice the CPUC's implementation of AB 327 (Perea, 2013). As codified in PU Code Section 2823.1(b)(1), the CPUC is directed to ensure that the Net Energy Metering (NEM) successor tariff/contract, currently under consideration in the open proceeding R.14-07-002, includes "specific alternatives designed for growth among residential customers in disadvantaged communities". One of the approaches currently being considered to ensure that eligible renewable energy resources are adopted by residential customers in disadvantaged communities is a proposed Incentive Enhancement to the Standard NEM Successor Tariff/Contract. Under this proposed option, the existing SASH and MASH programs would be provided with additional funding to expand the number of systems they install and to focus the installation of these additional systems in CalEnviroScreen-designated disadvantaged communities. In the event that this proposal is adopted as part of the R.14-07-002 proceeding, some customers would be eligible to participate in both the extended MASH program and the incentive program proposed by this bill. In addition, it may prevent the CPUC from adopting a more efficient and cost effective program to address the barriers that low income customers face in going solar.

SAFETY IMPACT

The bill has the potential to enhance the health and well-being of California citizens in so far as the renewable energy systems installed as a result of this program displace natural gas electric generation that has harmful health and environmental impacts associated with it.

RELIABILITY IMPACT

The bill has the potential to either negatively or positively impact the reliability of the electricity grid depending on the needs of the system and the locations where the renewable energy systems are installed.

RATEPAYER IMPACT

The \$100 million that would be used annually to fund the Multifamily Affordable Housing Renewables Program would, similar to any other clean energy and energy efficiency projects, reduce each utility's allowance proceeds available for the residential California Climate Credit. In aggregate, the revenues distributed for the residential California Climate Credit would be reduced by \$100 million per year. In effect, only residential customers would pay for the Multifamily Affordable Housing Renewables Program, not other classes of ratepayers.

Table 1 provides an illustrative example of the impact of the proposed program on the California Climate Credit using data from 2015. If the program were in effect in 2015, each Climate Credit for PG&E households, for example, would be reduced by about \$4 or 16%.³ The potential reduction in the value of the residential California Climate Credit ranges from about 10-20%, depending on the utility (Table 1). Although the proposed Multifamily Affordable Housing Renewables Program would not begin until 2016, this analysis estimates the magnitude of its impact on the Climate Credit.

Table 1: Potential Impact of Proposed Program on Residential California Climate Credit

	Actual October 2015 Climate Credit	Hypothetical 2015 Climate Credit Reduction	% Reduction
Pacific Gas and Electric Company	\$24.76	\$3.89	16%
Southern California Edison Company	\$29.00	\$5.57	19%
San Diego Gas & Electric Company	\$23.99	\$4.18	17%
PacifiCorp	\$141.03	\$15.82	11%
Liberty Utilities (CalPeco Electric)	\$35.01	\$4.29	12%

Because this bill would encourage the installation of renewable energy technologies and therefore increase the number of customers enrolled in net energy metering tariffs (NEM), it also has the potential to impact non-participant ratepayers. On October 28, 2013, the Commission issued a report on the costs and benefits of the NEM program (2013 NEM Report), in compliance with AB 2514 (Bradford, 2012).⁴ The study evaluated the costs and benefits of the NEM program using two separate measures: (1) a cost-benefit analysis, which estimates the net benefits (or costs) of a demand-side resource or program from the perspective of non-participating customers, and (2) a cost of service test, which compares the utility cost of serving NEM customers with their actual bill payments. Though the estimates contained in this report are subject to certain methodological limitations, the analysis suggests that NEM generation resulted in a net cost to other ratepayers (i.e., those not participating in NEM) of \$79 to \$252 million during 2012, increasing to \$370 million to \$1 billion per year in 2020. The report also notes that the costs of NEM are largely a function of retail rate designs, and that any future changes to the rate structure would have a significant impact on the results. With regard to the cost of service analysis, the study finds that NEM customers appear to be paying slightly more than their full cost of service. The study does

³ This analysis assumes that each utility would contribute to the 2015 allocation of \$100,000,000 in proportion to the relative number of allowances they received for 2015.

⁴ California Net Energy Metering Ratepayer Impacts Evaluation, available here: <http://www.cpuc.ca.gov/NR/rdonlyres/75573B69-D5C8-45D3-BE22-3074EAB16D87/0/NEMReport.pdf>.

not indicate how much NEM customers should be paying relative to non-participating customers in order for an electric utility to meet its revenue requirement.

FISCAL IMPACT

Implementation of the incentive program established by AB 693 requires the addition of one fulltime permanent Public Utilities Regulatory Analyst (PURA) IV, one permanent fulltime Administrative Law Judge III and one half-time Administrative Assistant within the ALJ Division, with an estimated fiscal impact of \$308,368. In order to implement this program the Commission would most likely have to implement an OIR in order to set the rules for how the 3rd Party administrator of the program is to be chosen and monitored. In addition, if AB 693 becomes law a mechanism/formula must be developed to distribute the funds to low income households and/or third party solar energy producers. This would require coordination with the four major California IOUs as well as the smaller IOUs. Any OIR would have numerous interveners seeking to influence the distribution and allocation of \$100 million each year. It would be expected that as the program continues there would be continued interest from Parties seeking to influence the program. Any OIR and ongoing Ratesetting proceedings would require Evidentiary Hearing, Workshops as well as Public Participation Hearings. This would necessitate one additional ALJ and halftime support staff. Additionally, the PURA IV would manage the overall implementation of the Multifamily Affordable Housing Renewables Program and provide support to ALJ Division in related proceedings.

AB 693 also requires the CPUC to produce an annual report to the Legislature assessing the success of the program. Due to the depth of analysis required by this report, the CPUC would need to contract with a consultant at an estimated annual cost of \$250,000.

The total fiscal impact of \$558,368 would be funded by the Public Utilities Commission Utilities Reimbursement Account (PUCRUA), Fund 0462.

ECONOMIC IMPACT

This bill would have a positive economic impact on developers and installers of the qualified renewable energy technologies identified by the bill. Due to the strength of the existing solar market and experience the industry has with multifamily affordable housing properties, it seems likely that the majority of systems installed under the proposed program would be solar-electric and solar-thermal.

The bill would also have a positive economic impact on low-income residents of qualified multifamily affordable housing that have renewable energy systems installed. The bill specifically requires that the electric generation of installed systems be used to offset the usage of low-income tenants and that these customers be enrolled in a virtual net metering tariff. These customers would see reduced utility bills as a result of the program.

As mentioned previously, the bill's requirement that all customers participating in the program be enrolled in virtual net metering tariffs could potentially exclude developers whose business models are primarily focused on properties that are master metered (for example many mobile home parks), as master metered properties are not eligible under existing VNM tariffs. These projects are eligible to receive an incentive under the current MASH program but would be ineligible under the proposed program. This could have a negative economic impact on developers who specialize in installing on master metered properties.

APPENDIX F - CPUC ANALYSIS OF AB 693

The bill could have a negative economic impact on residential customers as a whole. California's GHG Cap-and-Trade program may lead to marginal increases in the cost of goods and services, as well as the costs to produce electricity. The CPUC designed the California Climate Credit to preserve the spending power of California households. In developing the California Climate Credit, the CPUC reasoned that providing the credit to residential customers would "largely preserve the overall demand for goods and services in the economy" if "customers receive the value of the GHG allowance revenue and subsequently spend these revenues..." (D.12-12-033 at 109). Reducing the value of the residential California Climate Credit by \$100 million in aggregate could reduce the amount of money California households spend in the California economy.

LEGAL IMPACT

The proposed bill does contain some potentially problematic clauses.

1. As pointed out above, section 3(a)(3) requires:

In order to be eligible for its proposed incentive program, the bill would require that, in addition to meeting Section 2852's definition, eligible properties would have to meet at least one of the following requirements:

(A) "The property is located in a disadvantaged community as identified by the California Environmental Protection Agency pursuant to Section 39711 of the Health and Safety Code" (This refers to the CalEnviroScreen Tool); or,

(B) "At least 80 percent of the residents reside in households, adjusted by size, having incomes not in excess of 60 percent of the area median income of the county."

Section 3(d)(3), however, requires that the energy be "primarily used to offset electricity usage by low-income tenants" This has the potential of creating confusion regarding various possible situations. If, for example, 80 percent of a multi-family building are low-income households, do only those households get the offset [under Section 3(d)(3)] or does every household in the building share in that benefit? Clearer definitions of low-income would help alleviate interpretation problems.

2. The bill also caps administrative costs at 10% but also allows for the use of "performance-based incentives." Assuming that "performance-based incentives" means performance-based contracts, those type of contracts, typically do not track costs separately. As such, enforcing the 10% requirement may not be possible.

LEGISLATIVE HISTORY

Please see below.

BACKGROUND INFORMATION ON IMPACTED PROGRAMS, PRACTICE OR POLICY

Multifamily Affordable Solar Housing (MASH) and Single Family Affordable Homes (SASH)

Decision 06-01-024 established the California Solar Initiative (CSI) and committed \$2.5 billion of ratepayer funds over a 10-year period for solar incentives and required 10% of these funds to be used for projects for low-income residential customers and affordable housing projects. In 2006 the Legislature passed AB 2723 requiring the Commission to ensure that not less than 10% of overall CSI funds be used for the installation of solar energy systems on “low-income residential housing” as defined in the bill. In November 2007, the CPUC issued D.07-11-045, which established a \$108 million SASH incentive program for low-income homeowners to provide subsidies for solar energy systems on existing owner-occupied single family households. In October 2008, the Commission issued D.08-10-036, which established a \$108 million MASH incentive program for qualifying affordable housing developments, as defined in state law.

In 2013, the Legislature passed AB 217 which authorizes \$108 million in new funding for both MASH and SASH, sets a goal of 50 MW of installed capacity across both programs, and extends the programs until 2021, or the exhaustion of new funding, whichever comes first. Pursuant to AB 217, D.15-01-027 established a \$54 million budget for the MASH program with an installed capacity target of 35 MW and a \$54 million budget for the SASH program with an installed capacity target of 15 MW.

The MASH program currently has a waitlist of projects totaling over 50 MW of capacity and is closed to new applicants pending approval of the updated MASH program handbook and implementation details. We expect the program to reopen and begin processing waitlisted applications in mid-summer 2015.

Self-Generation Incentive Program (SGIP)

SGIP provides incentives for the installation of renewable and emerging technologies and non-renewable fueled conventional combined heat and power projects. The SGIP is funded at \$83 million a year through 2020. Wind, biogas and fuel cells are all technologies that are currently eligible for SGIP incentives and are also included in AB 693’s definition of “qualifying renewable energy technologies”. However, SGIP does not include a low-income component.

Reporting Requirements

The CPUC is required to submit an annual assessment of the CSI program (including CSI-Thermal) to the Legislature. The CPUC is also required to conduct a biennial assessment of the SASH and MASH programs performance.

California Climate Credit for Residential Customers

As part of its responsibilities under ARB’s GHG Cap-and-Trade Regulation and in PU Code §748.5, the CPUC determined how the electric investor-owned utilities use allowance proceeds to benefit electric utility customers. Each residential household that is a customer of an investor-owned utility receives a California Climate Credit on their electricity bill in April and October of each year. The amount of the Climate Credit will vary from year to year and from utility to utility. Table 2 shows the 2015 Climate Credit for each utility.

Table 2: 2015 Residential California Climate Credit

Electric Bill Provider	Credit Applied to Bill
PG&E	\$24.76
Liberty Utilities	\$35.01
SCE	\$29.00

APPENDIX F - CPUC ANALYSIS OF AB 693

Pacific Power	\$141.03
SDG&E	April: \$36.24 October: \$23.99

Though the Cap-and-Trade Regulation endures beyond 2020, the Regulation only allocates allowances to the utilities through 2020. Under current state regulations, 2020 will be the last year in which utilities receive allowance proceeds to return to customers or fund other programs.

OTHER STATES' INFORMATION

Not applicable.

SUMMARY OF SUPPORTING ARGUMENTS FOR RECOMMENDATION

The CPUC is neutral in support of this bill for the following reason(s):

- (1) The bill would expand access to the direct economic benefits of renewable distributed generation to low-income tenants of multifamily affordable housing properties.
- (2) However, the bill, as written, would require creating an incentive program that would be complex to administer, as 13 different renewable energy technologies would be eligible to participate.
- (3) The bill, as written, does not include a clear definition of "low-income" and it is unclear if the intent is to restrict participation in the program to CARE-enrolled customers

SUMMARY OF SUGGESTED AMENDMENTS

This bill should be amended in the following way(s):

- (1) PU Code Section 2870(c): ~~The commission shall require the administration of the program by a qualified third party administrator, selected by the commission through a competitive bid process. Not more than 10 percent of the funds allocated to the program shall be used for administration.~~
 - Although having a third party administer the program may be preferable to the utilities administering it separately in their respective territories, making this a requirement could reduce the CPUC's flexibility to design and implement the most efficient and effective program.
 - In addition, the bill should not limit the administrative budget to 10% of the total funds. The SASH program is currently administered by an effective and efficient third party and has an administrative budget of 15%.

- (2) PU Code Section 2870(d)(1): The commission shall authorize the award of monetary incentives for qualifying renewable solar and solar plus storage energy systems that are installed on qualified multifamily affordable housing properties...
- As written, the bill would create a program that would provide incentives to any of 13 different renewable energy technologies, including several that are highly unlikely to be installed on multifamily affordable housing properties (i.e., municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, tidal current). Creating effective incentive structures for such a diverse array of technologies would add considerable complexity to the administration of the incentive program with seemingly little practical benefit.
- (3) PU Code Section 2870(d)(2): For a ~~photovoltaic~~ qualifying renewable energy facility, the commission shall establish conditions for the monetary incentives that require appropriate siting and high-quality installation of the solar qualifying renewable energy system...The goal of this paragraph is to achieve efficient installation of solar qualifying renewable energy systems...
- and (5): The commission shall ensure that incentive levels for ~~photovoltaic~~ qualifying renewable energy installations receiving incentives through the program are aligned with the installation costs for ~~solar energy systems facilities using that particular technology~~ in affordable housing markets...
- As currently written, the program will incentivize a wide array of different renewable energy technologies, yet certain proposed provisions only apply to solar PV systems. It is unclear why this bill establishes specific requirements that apply only to PV systems.
- (4) PU Code Section 2870(d)(3): “The commission shall require that the electricity generated by the qualifying renewable energy systems installed pursuant to the program be primarily used to offset electricity usage by low-income tenants. These requirements may include required covenants and restrictions in deeds. Ratepayers participating in the CARE program shall be eligible for utility billing offsets”
- We recommend amending this section to provide a clear definition of “low-income”. It is unclear if the intent is to restrict participation in the program to CARE-enrolled customers.
 - The intention and meaning of the statement “Ratepayers participating in the CARE program shall be eligible for utility billing offsets.” is unclear.
- (5) PU Code Section 2870(a)(5)(b): The commission shall annually authorize the allocation of one hundred million dollars (\$100,000,000) from the revenues described in subdivision (c) of Section 748.5 for the Multifamily Affordable Housing Renewables Program, beginning with the fiscal year commencing July 1, 2016, and ending with the fiscal year ending June 30, ~~2026~~ 2020.
- Based on the current Cap-and-Trade Regulation, the last year for which the California Air Resources Board allocates allowances to the utilities is 2020; therefore that is the last year in which these revenues will be available under the current regulation.

SUPPORT/OPPOSITION

If available, list the names of any organizations that you know have a position on the current version of the bill. [OGA will provide]

VOTES

If available, list the vote count for the Senate Floor, Assembly Floor and Concurrence votes, and include the date. [OGA will provide]

OTHER PERTINENT INFORMATION

Please describe any other issue that was not previously discussed in this analysis that you believe should be highlighted. [For the Legislative Subcommittee]

ARGUMENTS FOR AND AGAINST THE BILL

Pro: (1) Existing renewable energy incentive programs may be insufficient to drive meaningful growth in adoption of renewable energy systems among residential customers in disadvantaged communities. This bill would allocate significant resources toward achieving that goal. Also, the MASH program is scheduled to end by 2021, or the exhaustion of funding, whichever comes first, so this program would continue similar funding for at least nine additional years.

(2) The bill would ensure that low-income residents of multifamily affordable housing receive direct economic benefit from the generation produced by the installed renewable energy system through offsets on their utility bills.

Con: (1) The bill would prejudge the CPUC's implementation of a tariff for disadvantaged communities to be implemented as part of the NEM successor tariff proceeding.

(2) The bill would reduce the revenues available to distribute to residential households as part of the California Climate Credit.

(3) The incentive program proposed by the bill would not benefit low-income residents of single-family homes.

(4) The incentive program proposed by the bill would be complex to administer as 13 different renewable energy technologies are eligible to participate.

(5) The incentive program proposed by the bill would exclude properties that are not eligible to enroll in a virtual net metering tariff due to being master metered or that do not wish to enroll in virtual net metering due to the added complexity and expense.

-END-

To: Wayne Waite, Policy Director, California Housing Partnership Corporation
From: Lewis Milford, Esq. and Seth Mullendore, Clean Energy Group
Date: August 1, 2016
Re: AB 693 Questions 8 and 9

In response to your request for an analysis of the inclusion of storage devices within implementation of AB 693 and for economic analysis on how storage could be integrated into a solar energy system to provide additional tenant benefits under the law, Clean Energy Group has prepared the following document. Our answers in regard to your request are set out below as responses to Questions 8 and 9 in the recent order issued in the AB 693 docket, “Administrative Law Judge’s Ruling Seeking Proposals and Comments on Implementation of Assembly Bill 693.”

8. Would a solar energy system paired with a storage device meet the definition in Section 2870(a)(4) of “solar energy system”? Why or why not?

Yes, storage would be included in the definition of “solar energy system” under the law. Based on the plain language of the law, its legislative history and interpretations of that term by other California and federal agencies, it is indisputable that "solar energy system" includes battery storage within its coverage. There are also quantifiably supported economic justifications and policy reasons to interpret the law to allow for storage integrated as part of a solar energy system under AB 693 (Eggman).

Having said that, our position is that AB 693 provides incentives for storage as an optional component of a solar balance-of-system, where appropriate, but storage is not required in all cases. Decisions on whether to incorporate storage with solar should be left to the affordable housing property owners and their constituencies, depending on what makes economic sense to fulfill their housing mission and provide tenant benefits with the incentive support under AB 693.

a. The Rules of Statutory Construction Favor Including Storage Within the Definition of “Solar Energy System”

California Public Utilities Code Section 2870(a)(4) defines a “solar energy system” as “a solar energy photovoltaic device that meets or exceeds the eligibility criteria established pursuant to Section 25782 of the Public Resources Code.” Unfortunately, neither this circular definition, nor the language in Section 25782 of the Public Resources Code provide any express guidance regarding whether paired storage is included within the definition of a “solar energy system.” However, analysis of Section 2879(a)(4) under the standard rules of statutory construction answer this question in the affirmative.

As the California Supreme Court stated in *Perry v. Gray* 319 P.3d 988, 992 (2014):

In construing a statute, we seek “to ascertain the intent of the enacting legislative body so that we may adopt the construction that best effectuates the purpose of the law.” (*Klein v. United States of America* (2010) 50 Cal.4th 68, 77; see *Miklosy v. Regents of Univ. of Cal.* (2008) 44 Cal.4th 876, 888.) Our analysis starts with the statutory language because it generally indicates legislative intent. (Klein, *supra*, at p. 77; *Chavez v. City of Los Angeles* (2010) 47 Cal.4th 970, 986.) If no ambiguity appears in the statutory language, we presume that the Legislature meant what it said, and the plain meaning of the statute controls. (*Miklosy*, *supra*, at p. 888; see *Catlin v. Superior Court* (2011) 51 Cal.4th 300, 304; *People v. King* (2006) 38 Cal.4th 617, 622.).

However, courts will consider statutory language to be ambiguous if it is susceptible to at least two reasonable constructions.¹ When a statute is ambiguous, a court “may look beyond its language to other evidence that helps elucidate the Legislature’s purpose.”² As the California Public Utilities Commission (CPUC) has stated, “[i]f the language is ambiguous or susceptible to more than one reasonable interpretation, the next step is to refer to the legislative history. If legislative history fails to provide clear meaning, the final step is to apply reason, practicality, common sense, and extrinsic aids.”³ The courts have identified “a variety of extrinsic aids, including the statutory scheme of which the provision is a part, the history and background of the statute, the apparent purpose, and any considerations of constitutionality,” which will be looked to “in an attempt to ascertain the most reasonable interpretation of the measure.”⁴ The court will aim to provide a construction of the statute that is faithful to its language, produces fair and reasonable results in a majority of cases, and which can be readily understood.⁵

With these rules in mind, the law clearly includes storage within its plain meaning and within its legislative intent.

i. The Plain Meaning of the Language of AB 693 Requires Inclusion of Storage

First, the plain language of “solar energy system” must refer to *all balance-of-system components of such a solar system*. This obviously would include all its component parts, such as inverters and mounting structures as well as storage devices. The language refers to a “system” not just a PV panel. The reason for the reference to “system” clearly is to include the

¹ California Public Utilities Commission, D.03-06-076, R.01-10-024 (Oct. 25, 2001) at p. 43 (citing *Hughes v. Board of Architectural Examiners* (1998) 17 Cal. 4th 763, 776).

² *In re Reeves*, (2005) 35 Cal. 4th 765, 771 (citing *People v. Canty* (2004) 32 Cal. 4th 1266, 1277); See Cal. PUC, D.04-04-020, R.01-05-047 (Apr. 1, 2004) at pp. 5-6.

³ California Public Utilities Commission, D.97-11-030, A.96-12-045 (Nov. 5, 1997) at p. 7; D.04-04-020 at p. 12.

⁴ *Hughes* at 776; D.03-06-076 a pp. 43-44; See Cal. PUC, D.01-01-060, A.00-11-037, A.00-11-043, A.00-11-044, A.00-11-045 (Jan. 31, 2001) at p. 13 (“[W]e ‘look to a variety of extrinsic aids, including the ostensible objects to be achieved, the evils to be remedied, the legislative history, public policy, contemporaneous administrative construction, and the statutory scheme of which the statute is a part.’”)

⁵ *In re Reeves* at 771 (citing *In re Joyner* (1989) 48 Cal. 3d 487, 495).

balance-of-system components that comprise a modern day solar system. In today's terms, that also clearly includes storage devices in increasing numbers in other better served markets.⁶

Adding specific references to various components of the plain language of "solar energy system" in the law would have been superfluous and redundant. That is, omitting reference to an inverter or a mounting rack in the statute obviously would not exclude that component from incentive coverage under AB 693. The legislature is presumed to know it is describing all the component, balance-of-system parts of a modern day solar system when it legislates in this important clean energy area. Thus, the common comprehensive meaning of the term solar energy system as it is designed today must be used.

Second, the cross-referenced definition supports a balance-of-system storage interpretation. The law provides that the term "solar energy system" means a "solar energy photovoltaic device that meets or exceeds the eligibility criteria established pursuant to Section 25782 of the Public Resources Code." Section 25782 requires that the system be located on the customer's property, used to offset the customer's load, and connected to the distribution system.⁷ It also outlines a number of criteria regarding metering, warranties and compliance with relevant codes and standards.⁸ Although Section 25782 does not expressly mention storage, its criteria are consistent with the inclusion of storage in the definition of a "solar energy system." However, looking carefully at the statutory scheme within which Section 25782 is contained provides further support for inclusion of storage within the meaning of solar energy system as defined in Section 2870(a)(4).

Sec. 25781(e) provides that a solar energy system is one that has the primary purpose of collecting and distributing solar energy:

“(e) ‘Solar energy system’ means a solar energy device that has the primary purpose of providing for *the collection and distribution of solar energy* for the generation of electricity, that produces at least one kW, and not more than five MW, alternating current rated peak electricity, and that meets or exceeds the eligibility criteria established pursuant to Section 25782.” (Emphasis added.)

Storage technologies clearly fall within this expressly stated definition of a device intended to collect and distribute solar energy. The referenced language in Section 25781(e) regarding the "collection and distribution of solar energy" obviously contemplates a full solar system with all balance-of-system components, including storage devices. A solar system that would both collect and distribute solar power requires an integrated system that includes many elements. Storage, as one possible element of this integrated system, adds control and flexibility to the process of collecting and distributing solar power, benefiting both the consumer and the grid.

⁶ Indeed, under the Self-Generation Incentive Program (SGIP) nearly 500 solar plus storage projects have been supported by public subsidies in California based on the best reading of the projects funded. See SGIP Weekly Statewide Report available at https://www.selfgenca.com/documents/reports/statewide_projects.

⁷ Cal. Res. Code § 25782(a).

⁸ Cal. Res. Code § 25782(a).

Third, other California agencies interpret the plain language statutory term “solar energy system” to include storage devices. For purposes of excluding property taxes on solar installations, the California State Board of Equalization specifically interprets the same term “solar energy systems” to expressly include “storage devices”:⁹

“An active *solar energy system* includes storage devices, power conditioning equipment, transfer equipment, and parts related to the functioning of those items. Parts include spare parts that are owned by the owner of, or maintenance contractor for, an active solar energy system for which the parts were specifically purchased, designed, or fabricated for installation in that system. Such a system includes only equipment used up to, but not including, the stage of conveyance or use of the electricity.” (Emphasis added.)

The California Clean Energy Authority also confirms reading of state tax exclusions for solar systems to include related storage devices.¹⁰ In addition, the California Civil Code on solar easements contains the following definition of “solar energy system”:

“(1) Any solar collector or other solar energy device whose primary purpose is to provide for the collection, *storage*, and distribution of solar energy for space heating, space cooling, electric generation, or water heating. (2) Any structural design feature of a building, whose primary purpose is to provide for the collection, *storage*, and distribution of solar energy for electricity generation, space heating or cooling, or for water heating.”¹¹ (Emphasis added.)

Indeed, standard reference documents on solar installation regularly include “battery technologies” under definitions of “solar energy system” components.¹²

Fourth and finally, the U.S. Department of Energy (DOE) interprets the term “solar electric system” to include storage as a solar balance-of-system component:¹³

“A typical...*solar electric system* consists of these components:

- Solar cells
- Modules or panels (which consist of solar cells)
- Arrays (which consist of modules)

⁹ California State Board of Equalization - Property and Special Taxes Department, "Guidelines for Active Solar Energy Systems New Construction Exclusion." Available at <https://www.boe.ca.gov/proptaxes/pdf/ta12053.pdf>

¹⁰ Clean Energy Authority, “California Solar Rebates and Incentives: California Property Tax Exclusion for Solar Energy Systems.” Available at <http://www.cleanenergyauthority.com/solar-rebates-and-incentives/california-california-property-tax-exclusion/>.

¹¹ California Civil Code Section 801.d

¹² For example: Peter Gevorkian, “Large-Scale Solar Power System Design: An Engineering Guide for Grid-Connected Solar Power Generation.” Available at <https://accessengineeringlibrary.com/browse/large-scale-solar-power-system-design-an-engineering-guide-for-grid-connected-solar-power-generation#e9780071763271ch03>

¹³ See <http://energy.gov/energysaver/small-solar-electric-systems> and <http://energy.gov/eere/energybasics/articles/solar-photovoltaic-system-design-basics>.

- *Balance-of-system parts.*

The balance-of-system equipment required depends on whether the system is a stand-alone system, connected to the electric grid, or a hybrid system. *Balance-of-system equipment can include:*

- Mounting racks and hardware for the panels
- Wiring for electrical connections
- Power conditioning equipment, such as an inverter
- *Batteries for electricity storage (optional)*” (Emphasis added.)

To implement that view, the DOE SunShot Initiative now includes a focus on solar plus storage cost reduction as integrated solar systems through its Sustainable and Holistic Integration of Energy Storage and Solar PV (SHINES) program.¹⁴

Clearly the plain language of AB 693 contemplates coverage of all the balance-of-system components, including storage devices, for a solar system.

ii. The Legislative History of AB 693 Points to the Inclusion of Storage

While we believe the plain language of the statute clearly points to the inclusion of storage, should the plain language be insufficient, courts will then look beyond the language to other evidence. The CPUC has determined that if the language is ambiguous, the next step is to refer to the legislative history.¹⁵ Reviewing the available legislative history in this case clearly indicates an intent to include storage.

During the legislature’s consideration of AB 693, the CPUC made specific recommendations on how to limit and define the technology scope of the “solar energy system” definition of the law. In an undated CPUC “Division Analysis” regarding AB 693 authored by Elizabeth Curran and Amy Kochanowky (Bill Version June 15, 2015), the CPUC specifically recommended that the bill reduce its broad technology scope—that then covered thirteen technologies—to provide incentives only for solar and solar plus storage projects, as follows:

“(2) PU Code Section 2870(d)(1): *The commission shall authorize the award of monetary incentives for solar and solar plus storage energy systems that are installed on qualified multifamily affordable housing properties...*”¹⁶ (Emphasis added.)

¹⁴ U.S. Department of Energy - Office of Energy Efficiency & Renewable Energy, "Sustainable and Holistic Integration of Energy Storage and Solar PV (SHINES)." Available at <http://energy.gov/eere/sunshot/sustainable-and-holistic-integration-energy-storage-and-solar-pv-shines>.

¹⁵ California Public Utilities Commission, D.97-11-030, A.96-12-045 (Nov. 5, 1997) at p. 7; D.04-04-020 at p. 12.

¹⁶ Curran, Elizabeth and Kochanowsky, Amy, California Public Utilities Commission, “Division Analysis: Multifamily Affordable Housing Renewables Program.” See attached document.

Thus, in the only legislative history directly on point, the expert administering agency CPUC recommended that the law's incentives be provided to solar energy systems that include storage devices.

iii. Other Interpretative Tools Call for Inclusion of Storage

In addition to the legislative history, it is appropriate to turn to a number of other extrinsic aids.¹⁷ These include, but are not limited to, the ostensible objective and apparent purpose of the statute, the contemporaneous administrative construction, the statutory scheme of which the statute is a part, the history and background of the statute, considerations of constitutionality, and public policy.¹⁸ Reliance on these other legislative interpretation tools compels the conclusion that energy storage with solar is a necessary requirement for fully achieving the goals of AB 693.

AB 693's legislative goal is quite broad to encompass "*clean energy and energy efficiency projects* for the Multifamily Affordable Housing Solar Roofs Program, which the bill would create." (Emphasis added.) Further, the legislature's goal in supporting installation of "solar energy systems" is to advance California's broad environmental goals: "qualifying solar energy systems in disadvantaged communities can provide local economic development benefits while advancing the state's renewable energy policies and policies to reduce emissions of greenhouse gases" (Section 1c).

Overall, the law's purpose is to ensure that low-income tenants of multifamily affordable housing in the state begin to obtain the economic benefits of both "clean energy and energy efficiency projects." The law implemented that broad goal through support for "solar energy systems" on affordable housing, to be done in a way that helps low-income tenants reduce their electric bills, while also achieving the other environmental and clean energy goals of the state.¹⁹

The CPUC has held that storage should be included where it can advance a program's goals by serving as an enabling technology to other statutorily covered technologies. In 2008, "advanced energy storage" was not a covered technology in the Self-Generation Incentive Program (SGIP). At the time, the statute authorizing incentives only covered wind and fuel cells, not storage; the statute was not amended until 2011 to explicitly authorize storage incentives. But in 2008, when storage was not explicitly mentioned in the law, the CPUC allowed storage to receive incentives under SGIP despite falling outside the scope of clearly defined eligible technologies, then wind

¹⁷ Ibid., City of Modesto.

¹⁸ *Hughes* at 776; D.03-06-076 a pp. 43-44; See Cal. PUC, D.01-01-060, A.00-11-037, A.00-11-043, A.00-11-044, A. 00-11-045 (Jan. 31, 2001) at p. 13.

¹⁹ According to a recent study, when sited and deployed according to air quality data, energy storage (and other distributed resources) can reduce reliance on polluting peaker power plants and lower emissions in disadvantaged communities. Researchers at UC Berkeley and nonprofit research institute PSE Healthy Energy found that storage can strategically replace more polluting energy services in the areas most susceptible to poor air quality and address decades-old discrepancies in environmental justice, whereby poor neighborhoods have been more likely to sit near the dirtiest power plants. So smart placement of storage under an AB 693 incentive regime could both reduce tenant bills and improve the health of low income tenants. See Krieger, Casey and Shonkoff, "*Framework for Siting and Dispatch of Emerging Energy Resources to Realize Environmental and Health Benefits: Case Study in Peaker Power Plant Displacement*," Energy Policy 96 (2016) 302-311

and fuel cells. It did so under the reasoning that storage devices operated to increase the value of those covered technologies and otherwise supported the goals of the clean energy program. That is, the CPUC concluded that storage, although not explicitly mentioned in the statute, nevertheless would be eligible for SGIP incentives as a “coupled technology” because it enhanced the value of the statutorily covered technologies for purposes of peak demand reduction.

In Decision 08-11-044, the CPUC stated:

“We agree that due to program ineligibility, AES [advanced energy storage] systems cannot be added to the SGIP as a stand-alone technology, but *when coupled with wind or fuel cell, AES could increase the value of wind and fuel cell and support the goals of SGIP for peak demand reduction. When so coupled, it would be appropriate to allow such AES facility to qualify for SGIP incentives.*”²⁰ (Emphasis added.)

The term “solar energy system” as defined in Sec. 2870(a)(4) should be construed to include incentives for storage based on the same reason the Commission utilized in authorizing storage incentives in the state’s SGIP program in 2008 – inclusion of storage will support the goals of AB 693. Namely, as discussed herein, by increasing the benefits available to be shared with tenants, inclusion of storage in the definition of solar energy system will ensure tenants receive benefits from clean energy and energy storage systems installed at their place of housing.

Furthermore, it is clear that inclusion of storage is necessary to achieving the goals of other important clean energy and environmental laws in California, which itself is one of the express legislative goals of AB 693.

First, one of the key expectations of Senate Bill 1, as referenced in the California Energy Commission (CEC) “Guidelines for California’s Solar Electric Incentive Programs,” is the expectation of “optimal system performance during periods of peak demand.”²¹ At lower levels of solar penetration, midday periods of peak solar production often aligned well with California’s historic periods of daytime peak demand. However, at levels of solar deployment already being achieved across the state, net grid electricity demand has decreased during sunny daytime hours. This shifts peak demand periods towards early evening hours of low or no solar production. This phenomenon is illustrated by the commonly-known “Duck Chart.”²² To address this problem, only the presence of storage devices can shift solar energy produced during the daytime to

²⁰ California Public Utility Commission, Decision 08-11-44, “Decision Addressing Eligible Technologies Under the Self-Generation Incentive Program (SGIP) and Modifying the Process for Evaluating SGIP Program Change Requests.” Available at http://docs.cpuc.ca.gov/published/FINAL_DECISION/94272.htm.

²¹ California Energy Commission, “Guidelines for California’s Solar Electric Incentive Programs.” Available at <http://www.energy.ca.gov/2012publications/CEC-300-2012-008/CEC-300-2012-008-ED5-CMF.pdf>.

²² California ISO, “What the duck curve tells us about managing a green grid.” Available at https://www.caiso.com/Documents/FlexibleResourcesHelpRenewables_FastFacts.pdf.

periods of peak evening demand and satisfy the state's policy goal of optimizing solar for those peak periods.

Second, the inclusion of energy storage within the definition of "solar energy system" is an express policy goal of the CEC. CEC has established a precedent for the consideration of storage as part of a solar energy system within its "Renewables Portfolio Standard Eligibility Guidebook".²³ Section III(F) of the guidebook states that:

"[A]n energy storage device may be considered an [RPS eligible] addition or enhancement to a facility if the device is either:

- a) Integrated into the facility, such that *the energy storage device is capable of storing only energy produced by the facility*, either as an intermediary form of energy during the generation cycle or after electricity has been generated.
- b) Directly connected to the facility, such that *electricity is delivered from the renewable generator to the energy storage device behind the meter used for RPS purposes* and any electricity from a source other than the renewable generator is included as an energy input to the facility. *The energy storage device must be operated as part of the facility* represented in the application and not in conjunction with any other facility, renewable or otherwise." (Emphasis added.)

Third, the CPUC also references these energy storage policies in Decision 14-05-033, "Decision Regarding Net Energy Metering Interconnection Eligibility for Storage Devices Paired with Net Energy Metering Generation Facilities".²⁴ In the decision, the CPUC clarifies net energy metering (NEM) interconnection existing policy, stating that:

"...storage devices that are 1) paired with NEM-eligible generation facilities, and 2) meet the [Renewables Portfolio Standard Eligibility Guidebook] requirements to be considered an 'addition or enhancement' to NEM-eligible systems are exempt from interconnection application fees, supplemental review fees, costs for distribution upgrades, and standby charges when interconnecting under the current NEM tariffs." (Emphasis added.)

Thus, the CPUC has defined a statewide goal to include storage within solar energy systems to advance the combined systems for purposes of net metering and RPS compliance goals.

Fourth, in addition to these strong California policy arguments, the inclusion of storage within the definition of "solar energy system" is perhaps most clearly expressed at the federal level. This federal approach is directly relevant to the PUC's proper interpretation and implementation of AB 693.

²³ California Energy Commission, "Renewables Portfolio Standard Eligibility Commission Guidebook." Available at <http://www.energy.ca.gov/2015publications/CEC-300-2015-001/CEC-300-2015-001-ED8-CMF.pdf>.

²⁴ California Public Utility Commission, Decision 14-05-033, "Decision Regarding Net Energy Metering Interconnection Eligibility for Storage Devices Paired with Net Energy Metering Generation Facilities." Available at <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M091/K251/91251428.PDF>.

Existing Treasury regulations treat energy storage devices as qualifying “solar energy property” for the purposes of Section 48 investment tax credit (ITC) eligibility. Treasury Regulation § 1.48-9(d) provides that qualifying “energy property” includes “solar energy property” for the purposes of Section 48. Section 1.48-9(d)(3) states that “[s]olar energy property includes equipment that uses solar energy to generate electricity, and *includes storage devices...and parts related to the functioning of those items.*” (Emphasis added.)

Based on the plain language of § 1.48-9(d) and private letter rulings applying the provision, energy storage devices, including battery systems and associated hardware, integrated with solar energy systems have been considered Section 48-eligible equipment.²⁵ That is, the Internal Revenue Service (IRS), as an administrative agency, has interpreted virtually identical statutory language on solar systems to include storage to advance key federal environmental and clean energy goals.

This IRS treatment of solar and storage as an integrated solar energy system is a position that should be followed at the state level to fulfill one of the key legislative purposes of AB 693 regarding federal tax credits. Section 2870(f)(4) of AB 693 provides:

“The commission shall ensure that incentive levels for photovoltaic installations receiving incentives through the program are aligned with the installation costs for solar energy systems in affordable housing markets *and take account of federal investment tax credits and contributions from other sources to the extent feasible.*” (Emphasis added)

The bill’s express legislative intent is that the law’s incentive levels should leverage all other sources of funding, including federal tax credits, to optimize limited state cap and trade funds. An interpretation of the term “solar energy system” to exclude storage – inconsistent with the IRS interpretation – would defeat this legislative purpose. It would deprive low-income tenants and affordable housing developers of the 30 percent ITC available to reduce the costs for combined solar and storage systems.

b. Dramatic Increases in Economic Savings Support Inclusion of Storage in AB 693 Incentivized Systems.

Reconciling CPUC’s position in this docket with other state and federal interpretations is also advanced by the overwhelming economic justification for the inclusion of energy storage in the implementation of AB 693.

²⁵ See PLR 201444025, issued May 5, 2014 and PLR 201308005, issued November 20, 2012, ruling that particular electricity storage devices and associated hardware were eligible for the tax credit as integral parts of a solar energy system. PLR 201308005 ruled that a particular energy storage device that could be charged by sources other than the associated solar system is considered a dual use equipment under § 1.48-9(d)(6) and is eligible for the Section 48 investment tax credit as “energy property.” This information is also available in comments filed with the Internal Revenue Service available at <http://www.cleangroup.org/ceg-resources/resource/comments-in-response-to-irs-notice-2015-70/> and presented in a recorded webinar with professionals from Deloitte Tax available at <http://www.cleangroup.org/webinar/financing-solarstorage-with-federal-tax-credits/>.

The inclusion of storage devices in AB 693 implementation will enable additional value creation through utility bill savings, achieving a greater pool of potential savings for low-income tenants. A solar and storage system can be leveraged to provide much greater benefits to affordable housing tenants than would be available with solar-only installations.

In summary, storage devices paired with solar can deliver additional bill savings for tenants (and property owners) over stand-alone solar through two avenues: 1) Reduction of demand charges for common area loads where those economic benefits can be shared by owners with tenants; 2) Shifting tenant solar energy use under time-of-use rates with storage, directly resulting in lower electric bills for tenants.

Both uniquely meet the primary goal of AB 693—delivering the most economic benefits of solar energy systems to low-income tenants—in ways that solar-only systems without storage cannot provide now or in the future.

1) Reduction of Demand Charges. The reduction of demand charge expenses for common area loads provides property owners with the ability to dramatically reduce their overall electric bills, providing them with greater incentive to install solar energy systems and new opportunities to share those savings with low-income tenants.²⁶ Quantitative economic evidence of these savings is presented in the report “*Closing the California Clean Energy Divide: Reducing Electric Bills in Affordable Multifamily Rental Housing with Solar+Storage.*”²⁷

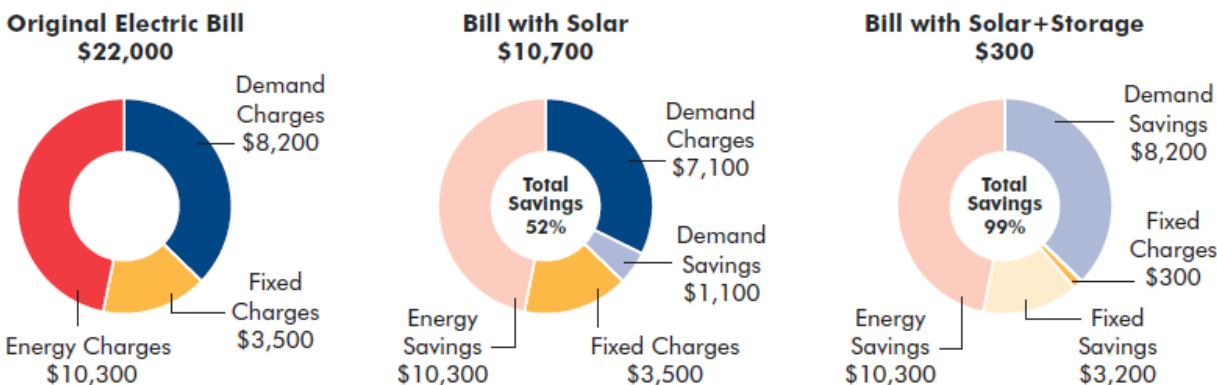
Based on the report’s findings, it makes economic sense today for many affordable housing properties in California to include storage in solar installations. In fact, storage was found to improve the economic return of a solar energy system across all of California’s investor-owned utilities. In some cases, adding storage could virtually eliminate common area electric bills, nearly doubling the bill savings of stand-alone solar at about a third of the installed cost.

As shown in the figure below, an affordable housing property in southern California could increase annual common area savings from \$11,400 with solar-alone to \$21,700 with solar and storage, resulting in an annual electricity bill of about \$300.²⁸

²⁶ It goes without saying but deserves repeating that no benefits for low-income tenants will be derived under AB 693 unless affordable housing owners have the correct incentives to install solar energy systems that can generate those tenant savings. AB 693 is an incentive program, not a mandate. Unless housing developers can see some savings from these systems and otherwise find ways to finance these systems, there will be no projects and thus no opportunities to share economic benefits with their tenants.

²⁷ California Housing Partnership, Center for Sustainable Energy, Clean Energy Group, and Geli, “Closing the California Clean Energy Divide: Reducing Electric Bills in Affordable Multifamily Rental Housing with Solar+Storage.” Available at <http://www.cleangroup.org/ceg-resources/resource/closing-the-california-clean-energy-divide/>.

²⁸ Of course, not all affordable housing properties will have the load characteristics to achieve these savings. That is the point of making storage an eligible, but not mandatory, component under AB 693. These are complex questions that property owners should be responsible to explore based on their utility bills and property needs. Any incentive scheme should let them develop the best combination of technology solutions – including energy efficiency, solar and storage – creating the best business case using available AB 693 incentives and other available sources of funding, including federal tax credits for solar and storage systems.



Source: Clean Energy Group

To meet AB 693 goals, there are a number of ways to ensure tenants directly share in these common area savings. For some properties, more of the solar portion of the integrated solar energy system can be allocated to directly offset tenant electricity consumption than would be feasible without storage, which is particularly important for multi-story buildings and those located in dense urban areas. Other properties may choose to adopt a shared savings model, under which tenants are directly allocated a portion of the common area demand charge savings. These and other measures can be developed. In any case, once established, this program should establish clear metrics that would lead to the adoption of administrative approaches to ensure primary tenant benefits through these mechanisms.

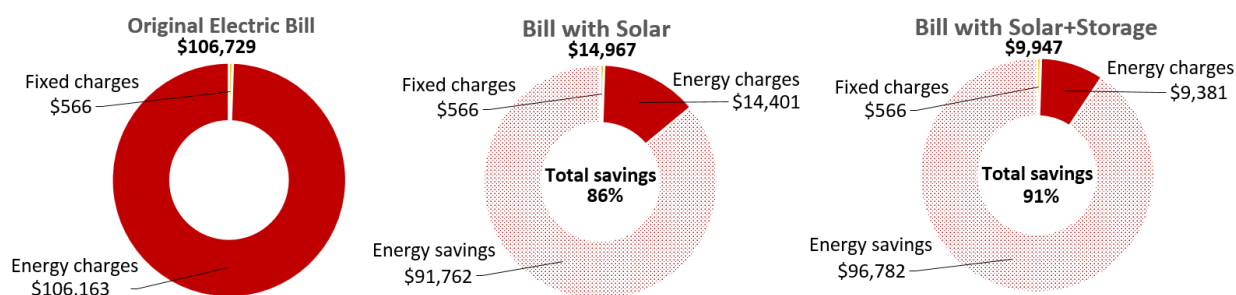
2) *Shifting Tenant Solar Energy Under Time-of-Use Rates.* The second avenue for tenant bill reduction after sharing demand charge savings through solar and storage is taking advantage of ways to reduce time-of-use (TOU) rate impacts. Under various state energy policy changes, TOU rates will soon be applied to all California residential utility customers. Solar customers are already being transitioned to TOU rates, and default TOU rates will be introduced for all residential customers in 2019, including CARE customers.

As a result, affordable housing tenants will have the opportunity to directly benefit from the incorporation of storage devices through the ability to shift the consumption or export of solar energy from periods of low electricity pricing to periods of high electricity pricing.

To date, no one has done any bill impact analysis on the effect of solar and storage on low-income TOU rates. As shown in the figure below, we have done this analysis for the first time. This new information shows that solar time-shifting through adding storage can result in lower

tenant electricity bills and maximize the value of solar system investments. That is, this time-shifting and TOU related bill reduction results only if storage is added to the solar installation.

These results are for an illustrative affordable housing property with 75 units, and assumes tenants are on a current Southern California Edison (SCE) residential TOU rate tariff. Adding storage increases annual tenant solar bill savings by more than \$5,000 per year. These additional savings represent a direct benefit to tenants that would not be available without the inclusion of storage devices.



Source: Geli/Clean Energy Group

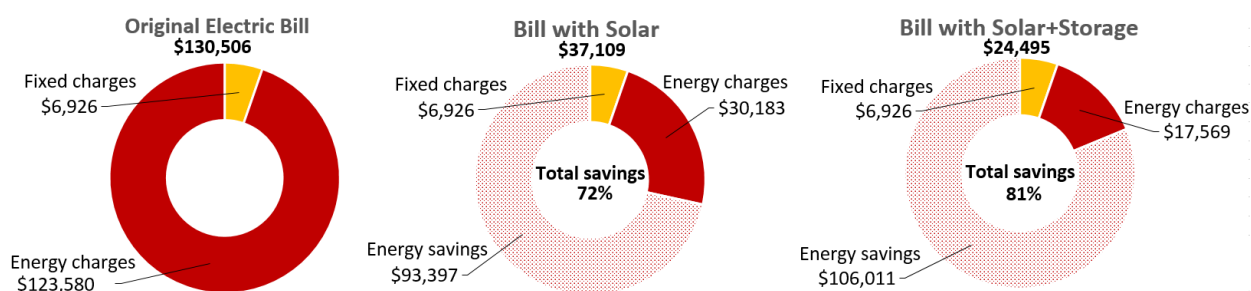
So adding storage to solar results in two additional ways to deliver bill savings under current electric rate tariffs and reduce tenant energy expenses under AB 693 on top of savings from a solar-only system. First, based on our new analysis, tenants could share in over \$10,000 in additional utility bill savings from reducing demand charges on common area loads. Second, tenants could benefit directly from the additional \$5,000 or more in savings annually from adding storage to a stand-alone solar system. Thus, adding storage to an illustrative building under current tariffs can result in more than \$15,000 per year in additional savings available to share with tenants under the law. Over the likely lifetime of such projects, such additional savings could total over \$200,000 in electric bill savings that would be available to share with tenants for this single representative project alone – but only if storage is added to solar systems.

3) Future Economic Opportunities for Solar and Storage. Additional opportunities for bill reduction through combined solar and storage will become increasingly important as new policies come into place in California. Distributed energy resource market opportunities, NEM policies, and utility rate tariffs, will all evolve over the lifetime of the implemented multiyear program.

To protect tenants from changes that could negatively impact the value proposition of solar and include them in California's energy transition, AB 693 should be geared to leave every pathway open to providing value to low-income customers.

To assess that future scenario and how storage could mitigate against harm to low-income tenants, we also have done the first economic analysis of potential tenant electric bill savings enabled by storage under expected future solar policy scenarios. This first time analysis is illustrated in the figure below.

This analysis is based on piloted future TOU rates proposed by SCE, where peak periods have shifted to later in the day when solar PV is not generating electricity. Adding storage increases annual tenant bill savings by nearly 10 percent, resulting in an additional \$12,600 in direct tenant savings per year.



Source: Geli/Clean Energy Group

Adding this to the \$10,400 in savings achieved through demand charge reduction, an affordable housing property with 75 units in southern California would realize an additional \$23,000 in annual savings, representing over \$300 in savings per unit each year that would not be available without storage. Under this predicted future scenario, storage would add over \$300,000 in electric bill savings to a solar installation over the projected lifetime of the project.

These economic justifications are not meant to imply that energy storage is right for all multifamily affordable housing solar projects or that it should be mandated for certain projects. It is presented to show that storage has the potential to increase the overall economic benefit and return on public investment of installing solar on a subset of affordable housing properties. In cases where similar utility tariffs and other conditions apply, combining storage with solar results in more economic savings available to affordable housing properties under AB 693 than simply providing incentives to stand-alone solar. As with solar-only systems, those solar energy systems incorporating storage should be implemented in a way that ensures the system primarily benefits affordable housing tenants.

c. Other Practical and Policy Reasons to Include Storage.

In many urban areas, suitable roof space for solar on multi-family housing may be quite limited in this program. That could mean very small solar systems delivering little economic benefit to tenants or owners. Where solar space is quite limited, the inclusion of storage may provide the

necessary economic incentive for owners to install an integrated solar and storage system for the benefit of tenants. Excluding storage could well minimize the benefits delivered to thousands of low-income residents living in high-rise buildings in the state's urban areas.

This opportunity for bill reduction through combined solar and storage also will become increasingly important as new solar policies come into place in California. Distributed energy resource market opportunities, NEM policies, and utility rate tariffs, such as the shift to residential time-of-use rates, will all evolve over the lifetime of the implemented program. To protect tenants from these changes and include them in California's energy transition, AB 693 should be geared to leave every pathway open to providing value to low-income customers, so that they have access to technology options capable of responding to utility value signals today and in the future.

This gets to the overarching reason to interpret AB 693 as including storage within solar systems. The main purpose of AB 693 is to afford affordable housing and low-income tenants targeted incentives so that they too can benefit significantly from current clean energy policies that typically serve more well-off customers. Affordable multifamily housing needs a dedicated program to reach this underserved market. This promotes the overall legislative goal of AB 693 – to have low-income people benefit in the clean energy transition in the same way that other customers now benefit from public purpose programs.

In opposition to the positions here, arguments might be made in this docket to limit these financial incentives only to solar technologies. But that solar-only position should be rejected.

It would exclude low-income tenants and affordable housing owners from the well proven, emerging financial benefits of storage technologies that are an increasingly integral part of solar energy systems. As with solar, low-income communities should have dedicated incentives to enable the same access to storage technologies now available to customers in the state who benefit from other incentive programs, such as SGIP.²⁹

It would be shortsighted, to say the least, for the state to subsidize the well-off to use the full panoply of state incentives to install solar and storage systems now, while taking the position that affordable housing properties somehow are not yet ready for these technologies, or should wait for the market to mature. To the contrary, affordable housing owners and their tenants should have the same options as other customers to choose the clean energy technology suite that best suits their needs now and in the future of ever changing regulatory regimes – including energy efficiency, solar, and storage.

That is especially true as AB 693 is designed to be a multi-year program. Rather than put affordable housing developers and low-income tenants in a clean energy technology “second class,” policy decisions in this docket should enable this market to prepare itself for the future, which is a future of solar and storage.

²⁹ Waite and Milford, “Efficiency, Solar and Storage Offer a Unique Opportunity to Bring Clean Energy to Affordable Housing.” Available at <http://www.greentechmedia.com/articles/read/affordable-housings-progress-toward-integrated-energy-solutions>.

Indeed, this is how the solar industry sees the future of solar –connected to storage. The CEO of SolarCity, Lyndon Rive, recently was reported to have said, “Within five years, around that time frame, every solar system we deploy will have a storage system tied to it.”³⁰ SolarCity has stressed the need for storage to be paired with solar. As one representative recently said, “We think storage will be absolutely necessary to enable the deployment of solar across the grid at extremely high penetrations.”³¹

California’s solar energy industry association CALSEIA also agrees that the future of solar must include storage. It calls solar and storage “the industry’s ultimate symbiotic relationship.”³² The solar trade association confirms that “with the growth trajectory of solar, energy storage will soon be necessary.”³³ Further, it promotes its own research predicting “that 10% of behind-the-meter solar installations are likely to include storage by 2020.”³⁴ CALSEIA goes on to argue that “as storage becomes more widely available, we need to make sure the process for installing storage is easy and transparent.”³⁵

Any policy implementation in AB 693 for low-income communities should reflect how the industry plans for the future of solar to include storage devices. These statements should be more than industry marketing, but rather should reflect active business support to fully integrate low-income communities into this solar and storage technology future. Failure to do so would produce clearly inequitable results for the very people AB 693 was designed to protect.

What would the policy future look like if storage is excluded from the coverage of AB 693? It presumably would mean only solar systems without storage would receive program incentives, perhaps resulting in less than optimal systems in dense urban areas. It would mean, as the financial analysis shows, that affordable housing tenants and owners would, in many cases, receive far less economic benefit than from combined solar and storage systems. It would mean housing developers could not take advantage of federal tax credits for combined solar and storage systems, since the absence of state incentives would likely make combined projects less economic to pursue. It would mean that housing owners would not have incentives to provide more reliable, and cleaner backup power to their vulnerable tenants with solar and storage systems, forcing them to rely on unreliable and dirty diesel generators. Assuming current policy positions are implemented as proposed in the state, it would expose low-income customers and affordable housing developers to future uncertainties in time-of-use rate tariffs and adjusted NEM policies, without the option to mitigate those financial risks with storage. And presumably it would mean that affordable housing owners that wanted to install storage would have to

³⁰ David Robison, *The Buffalo News*, “SolarCity, Tesla roll out batteries that store sun’s energy for nighttime.” Available at <http://www.buffalonews.com/business/solarcity-tesla-roll-out-batteries-that-store-suns-energy-for-nighttime-20150808>

³¹ GTM, “Lessons Learned From SolarCity’s First Home Energy Storage Installs, Updated.” Available at <http://www.greentechmedia.com/articles/read/Lesson-Learned-From-SolarCitys-First-Home-Energy-Storage-Installs>

³² California Solar Energy Industries Association, “Solar and Energy Storage: technology’s ultimate symbiotic relationship.” Available at <http://calseia.org/energy-storage/>

³³ Ibid.

³⁴ Ibid.

³⁵ Ibid. Emphasis added.

compete for SGIP incentives with larger commercial and industrial players in the state (since SGIP has no provisions for low-income market participation).

These results would prevent low-income tenants and property owners in this underserved market from having equal access to the full array of solar and storage technology markets and state incentives that now principally benefit the state's high-end customers. A view to deprive housing developers and low income tenants of the emerging economic, environmental, and resilient value proposition of solar and storage plainly would discriminate in technology funding decisions against the very low-income people this new legislation was designed to benefit.

These results would squarely defeat the legislative purpose of AB 693 – to give the state's low-income population a serious choice and a fair place in the new energy economy. In a cruel irony, this absurd, if not paternalistic, interpretation would turn the impressive equity goal of the law firmly on its head.

9. If you believe that a solar energy system paired with a storage device meets the Section 2870 definition, should the Commission adopt incentive levels or structures for these projects that differ from the incentive structure that you have recommended in response to Question 7 for systems without storage? If so, how should the incentives differ? Please be specific and provide quantitative examples if relevant.

Storage devices, while an integral part of many solar energy systems, are a very different type of technology than solar, with unique capabilities and separate cost trajectories. Due to these differences, a separate incentive structure should be adopted for the storage portion of a solar energy system. However, inclusion of a storage device in a solar energy system should not alter the proposed incentive structure for the solar portion of the project.

We propose the following incentive structure for solar energy systems that include storage devices:

- *Solar Incentive.* Incentives for the solar PV panels and balance-of-system components, excluding storage devices, should remain at the proposed incentive level for a solar energy system regardless of the inclusion of storage.
- *Storage Incentive with Modified Stepdown.* There should be a separate incentive structure defined specifically to apply to the storage portion of a solar energy system. A good basis for setting the initial incentive level for storage devices can be found in the recent CPUC proposed decision revising the SGIP.³⁶ The decision proposes the adoption of incentives for advanced energy storage technologies at an initial level of \$0.50 per watt-hour for storage systems greater than 10 kilowatts and \$0.60 per watt-hour for systems of 10 kilowatts or smaller, with a four subsequent steps reducing the incentive by \$0.05 per watt-hour at each step. Setting the same storage incentive structure for storage devices

³⁶ California Public Utilities Commission, "Decision Revising the Self-Generation Incentive Program Pursuant to Senate Bill 861, Assembly Bill 1478, and Implementing Other Changes." Available at <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M162/K005/162005693.PDF>.

under AB 693 should catalyze investment in storage technologies without overly subsidizing the technology.

While it makes sense to base the storage device incentive on the structure defined in the SGIP decision, the stepdown in incentive levels should not necessarily follow the same timeline. Like solar, storage development for affordable housing may be a more complex market and require a slower decline in incentive levels than the larger California market. The storage incentive level should be periodically reviewed by the program administrator and adjusted as necessary.

- *Cap for Solar Energy System Incentive.* The total solar energy system incentive available under AB 693, inclusive of both solar and storage incentives, for any project should not exceed 100 percent of the installed system cost, adjusted for other sources of funding, for portions of the system providing economic benefits to tenants and should not exceed 70 percent of the installed system cost, adjusted for other sources of funding, for portions of the system providing economic benefits to common areas.

Additionally, boundaries should be set on system sizing to ensure the incentive structure promotes deployment of storage systems designed to optimize economic return for both common area loads and tenants. Each storage system will have two sizing constraints: 1) Power (kilowatts) and 2) Duration (hours).

Power. For common area loads, the primary economic opportunity for storage is currently through peak demand reduction. Because of this, the portion of a storage device sized to target common area loads should be limited to a rated power of no greater than a property's anticipated peak demand.

For tenants, the primary economic opportunity for storage is currently through energy time-shifting, also known as arbitrage. Due to the goal of AB 693 to deliver tenant benefits through deployment of solar energy systems, storage devices designed for tenant energy time-shifting should be limited in rated power to the rated power output of solar system deployed for direct tenant benefits. In this way, the storage device will be sized appropriately to shift solar generated energy as well as have an opportunity to take advantage of available federal investment tax credits for solar energy system components.

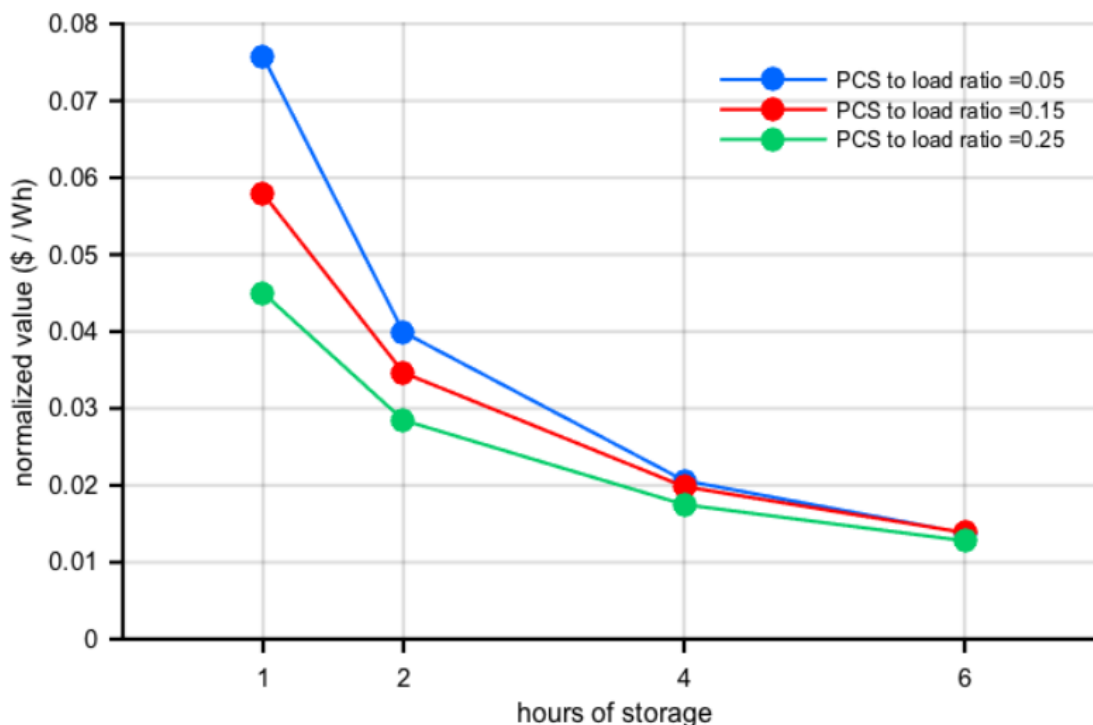
A storage device designed for both common area and tenant benefits should have a total power rating of no more than the combined total of anticipated peak common area load and rated power output of solar designated to directly benefit tenants.

Duration. Based on an analysis of nine California affordable housing properties, optimal duration for common area peak demand reduction in affordable housing ranged from 1.5 hours to 3 hours, with an average duration of 2.6 hours.³⁷

³⁷ California Housing Partnership, Center for Sustainable Energy, Clean Energy Group, and Geli, "Closing the California Clean Energy Divide: Reducing Electric Bills in Affordable Multifamily Rental Housing with

This is consistent with analysis by Geli that was included in comments submitted by the solar industry group CALSEIA regarding the May 16th, 2016 CPUC proposed decision to revise SGIP.³⁸ The figure below, which was included in CALSEIA's comments to the CPUC, illustrates that the value of demand charge mitigation begins to drop off at the 2-hour duration point and significantly declines after 4 hours.

Figure 1. Geli Analysis of Customer Value for Demand Charge Mitigation



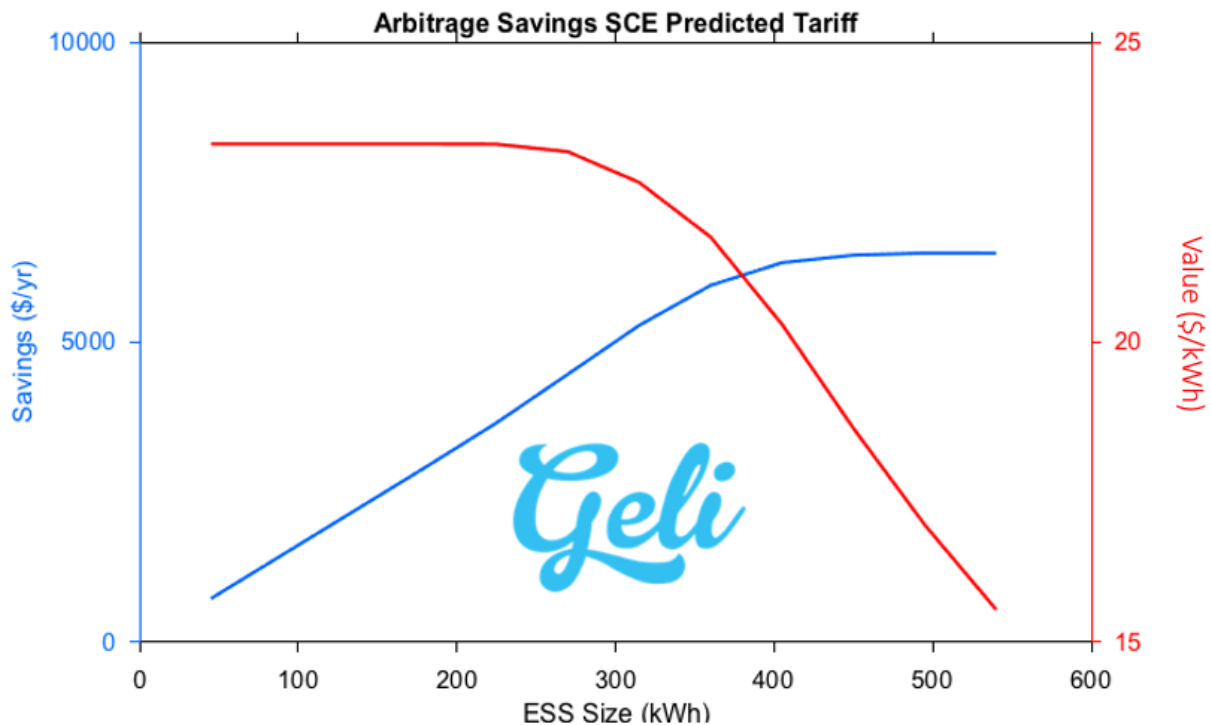
Source: California Solar Energy Industries Association/Geli

An analysis by Geli of the value proposition for storage devices performing residential energy time-shifting came to a similar conclusion. The figure below shows the energy arbitrage value proposition of a 120 kilowatt storage device shifting solar energy to impact affordable housing tenant loads under a predicted future Southern California Edison TOU rate tariff. At about 300 kilowatt-hours, or a storage duration of 2.5 hours, the value in dollars per kilowatt hour begins to decline more rapidly and savings begin to level off. A similar inflection point was found for tenants under Pacific Gas & Electric and San Diego Gas & Electric TOU rate tariffs.

Solar+Storage.” Available at <http://www.cleangroup.org/ceg-resources/resource/closing-the-california-clean-energy-divide/>.

³⁸ California Solar Energy Industries Association, "Comments of the California Solar Energy Industries Association on the Proposed Decision on Reforms to the Self-Generation Incentive Program." Available at <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M163/K152/163152824.PDF>

APPENDIX G - ENERGY STORAGE LEGAL ANALYSIS



Source: Geli/Clean Energy Group

Based on these results, it is recommended that storage device duration incentivized under implementation of AB 693 be limited to no more than 3 hours. So that, for example, a storage device with a power rating of 100 kilowatts be limited to a capacity of no more than 300 kilowatt-hours.

These power and duration constraints should allow for optimal system design, while discouraging uneconomic oversizing of storage devices.